

PRIVACY NOTICE



INTRODUCTION

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Banor Capital Limited is pleased to provide the following Privacy Notice.

PERSONAL DATA

Banor Capital Limited uses the information collected from you to make telephone contact and to email you marketing information which Banor Capital Limited believes may be of interest to you and your business. In you making initial contact you consent to Banor Capital Limited maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services. Banor Capital Limited also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Banor Capital Limited will be acting on the instruction of its client, and will work hard to ensure that the client is fully GDPR compliant.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. Banor Capital Limited may from time to time use such information to identify its visitors. Banor Capital Limited may also collect statistics about the behavior of visitors to its website.

Banor Capital Limited's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Banor Capital Limited website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Banor Capital Limited's website.

Any information Banor Capital Limited holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

Banor Capital Limited will only collect the information needed so that it can provide you with marketing and consulting services, this agency does not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Banor Capital Limited has purchased from a third-party list broker, on behalf of a client.

PRIVACY NOTICE



Legal basis for processing any personal data

To meet Banor Capital Limited's contractual obligations to clients and to also respond to marketing enquiries.

Legitimate interests pursued by Banor Capital Limited and/or its clients

To promote the marketing and consulting services offered by Banor Capital Limited and/or to market the services and/or products offered by Banor Capital Limited's existing clients.

Data Storage

Data is held in United Kingdom using different (multiple) servers. Banor Capital Limited does not store personal data outside the EEA.

Consent

Through agreeing to this privacy notice you are consenting to Banor Capital Limited processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing DPO@BANORCAPITAL.COM or writing to us, see last section for full contact details.

Retention Policy

Banor Capital Limited will process personal data during the duration of any contract and will continue to store only the personal data needed for five years after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

Disclosure

Banor Capital Limited may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Banor Capital Limited requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

Banor Capital Limited do not broker or pass on information gained from your engagement with the agency without your consent. However, Banor Capital Limited may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The agency may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Banor Capital Limited, its clients and/or the wider community.

YOUR RIGHTS AS A DATA SUBJECT

At any point whilst Banor Capital Limited is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.

- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Banor Capital Limited refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Banor Capital Limited at your request can confirm what information it holds about you and how it is processed.

YOU CAN REQUEST THE FOLLOWING INFORMATION:

- Identity and the contact details of the person or organisation (Banor Capital Limited) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Banor Capital Limited or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

PRIVACY NOTICE

TO ACCESS WHAT PERSONAL DATA IS HELD, IDENTIFICATION WILL BE REQUIRED

Banor Capital Limited will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Banor Capital Limited is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to dpo@banorcapital.com or by phoning +44(0)203 002 1867 or writing to us at the address further below.

COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Banor Capital Limited or its partners, you have the right to complain to Banor Capital Limited's Complaints Officer. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:
Banor Capital Limited, Eagle House
108-110 Jermyn Street, London, SW1Y 6EE,
UNITED KINGDOM
Telephone: +44(0)203 002 1860 or email:
Giacomo.Mergoni@banorcapital.com

Data Protection Regulator
Information Commissioner's Office
Telephone +44 (0)303 123 1113
Website: <https://ico.org.uk/concerns/>