

DATA PRIVACY POLICY OF INDEPENDENT BOARD EVALUATION

1. BACKGROUND

IBE is committed to protecting your personal information.

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed; we will update this Policy on our website.

- 1.1. IBE collects and uses certain Personal Data. IBE is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.
- 1.2. At IBE, we respect your privacy and we are committed to keeping your Personal Data secure.
- 1.3. This Privacy Policy is directed to individuals whose Personal Data we handle in the course of carrying on our commercial activities. Those individuals could be Clients or prospective Clients or their representatives, agents or appointees, or an employee, director, officer or representative of another organisation with which we have a business relationship. This Privacy Policy is also directed to visitors to our websites.

2. OVERVIEW OF CIRCUMSTANCES IN WHICH WE HANDLE YOUR PERSONAL DATA

IBE gathers information about you in the course of providing products or services to you. This may be provided directly from you or from other parties.

3. THE TYPES OF PERSONAL DATA WE COLLECT

Many of the products or services offered by IBE require us to obtain and process Personal Data, such as:

Information that you provide to IBE. This includes information about you that you provide to us. The nature of our relationship with you will determine the kind of Personal Data we might ask for. Such information may include basic Personal Data such as first name; family name; email address; phone number; address (including city postcode and country); and occupation and job title;

Information that we collect or generate about you. This may include:

- files that we may produce as a record of our relationship with our Clients and prospective Clients, including contact history; and
- any Personal Data that you provide during telephone and email communications or in face-to face meetings with us which we may monitor and record in order to improve our service and in order to comply with our legal and regulatory requirements; or

Information we obtain from other sources. Some of this personal data may be sensitive and may include:

- information from publicly available sources, including public databases, registers and records such as Companies House and the FCA Register; and other publicly accessible sources;
- information provided to us by industry databases and other business intelligence tools IBE subscribes to; and

4. HOW WE USE YOUR INFORMATION

(4.1) Your Personal Data may be stored and processed by us in the following ways and for the following purposes:

- to deliver our service to our Clients and to keep our records up to date;
- for the management and administration of our business;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations and internal policies and procedures, or
- for the administration and maintenance of databases storing your Personal Data.

(4.2) When we use your Personal Data, we comply with applicable law. The law allows or requires us to use your Personal Data for a variety of reasons. These include instances where:

- we are performing our contractual obligations;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or those of our Clients or for the purpose of legal proceedings;
- we have obtained your consent;
- the use of your Personal Data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively and efficiently manage and administer the operation of our business;
 - maintaining compliance with internal policies and procedures;

(4.3) Within IBE, your Personal Data is accessed only by personnel of IBE that have a need to access it for the purposes described in this Privacy Policy.

5. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

(5.1) We may share your Personal Data within IBE for the purposes described above.

(5.2) We may also share your Personal Data outside of IBE as further described below:

- with representatives, agents, custodians, intermediaries and/or other third party product providers appointed by the Client or prospective Client (such as accountants, professional advisors, custody service providers and product providers);
- with third party agents and contractors for the purposes of them providing services both to us (for example, accountants, professional advisors, IT and communications providers, background screening providers, credit reference agencies and debt collectors) and to Clients or prospective Clients. These third parties will be subject to appropriate data protection obligations;
- to the extent required by law or regulation, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators, auditors or public authorities), or to establish, exercise or defend its legal rights; and
- if we sell any part of our business or our assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes.

6. HOW WE SAFEGUARD YOUR PERSONAL DATA

Data is a critical business asset and must be protected appropriate to its risk as well as its importance or value.

We ensure safe processing operations by operating and maintaining physical, electronic and procedural safeguards to guard your non-public personal information and we restrict access only to authorised personnel. The effectiveness of these safeguards is periodically tested.

We have controls and mechanisms in place designed to detect, respond and recover in case of adverse events that may arise.

7. HOW LONG WE KEEP YOUR PERSONAL DATA

The length of time for which we hold your Personal Data will vary as determined by the following criteria:

- the purpose for which we are using it (as further described in this Privacy Policy at paragraph 4) – we will need to keep the data for as long as is necessary for that purpose; and
- our legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

8. YOUR RIGHTS

In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. These rights include:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain your Personal Data to comply with a legal or regulatory obligation or to satisfy our internal audit requirements;
- in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit such data to a third party where this is technically feasible. Please note that this right only applies to Personal Data that you have provided directly to IBE;
- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are required or entitled to retain it;
- the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are required or entitled to refuse that request; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us. You can exercise your rights by contacting us using the details provided at paragraph 10 below.

9. CHANGES TO THIS PRIVACY POLICY

Any changes we make to our Privacy Policy in the future will be posted on the website and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

10. QUESTIONS AND CONCERNS

If you have any questions or concerns about IBE's handling of your Personal Data, or about this Privacy Policy, or to exercise any of your rights, please contact us at the address below.

info@ibe.uk.com

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive, you may escalate concerns directly to your local courts or Data Protection Supervisory Authority competent for your jurisdiction.

If you raise a concern, we may:

- request additional details from you regarding your concerns and personal data limited to what is necessary for the purpose of authenticating you;
- engage or consult with other parties in order to investigate and resolve your issue (and these parties will receive and process information about you); and/or
- keep records of your request and any resolution of your issue,

in each case in accordance with our data protection and other legal obligations.