

# Privacy Notice

## Statement

Hurley Palmer Flatt Ltd and its subsidiaries (“**HPF**”) is committed to maintaining the privacy and security of your personal information (“**Personal Information**”) and complying with relevant data protection legislation. Please take the time to read this Privacy Policy, as it provides information about the types of Personal Information HPF may collect and how it is used and protected.

## About Us

As a global professional services firm, HPF acts as a data controller for the Personal Information provided by clients, business partners, and other individuals, including website users and job applicants. The details of HPF entities who are data controllers of Personal Information are set out [here](#). If you have any questions about the data controller of your Personal Information, please refer to the “**Contact us**” section below.

## Collection and use of personal Information

The types of Personal Information that HPF collects and processes about you depend on whether you are a potential or existing client or business partner, a HPF website user or an applicant to a position within HPF. Where you provide HPF with Personal Information about other individuals (for example, other people within your organisation), please refer them to this Privacy Policy.

View the categories below to understand how HPF collects and processes your personal Information.

### **HPF Website users, or persons interacting with HPF on Social media or by email.**

#### **What information may HPF collect?**

- Your name.
- Company.
- Title.
- Email address.
- Telephone number.
- Your IP address.

### **How will HPF collect your Personal Information?**

- Through requests or inquiries to HPF through e-mail, social media sites or affiliated blogs.
- Through a subscription to an HPF newsletter, blog or other marketing related messages.
- Through your access to HPF websites (cookies may be placed on your computer or mobile device).

### **What does HPF use your Personal Information for?**

HPF uses the Personal Information it is provided with for legitimate business purposes, including marketing its services, engaging in business development activities or as otherwise permitted by applicable law. The following are examples of the ways HPF uses your Personal Information for business purposes:

- To answer any inquiries or requests you make.
- To further communicate with you on any matter relating to your inquiry or request.
- To contact you about other HPF information and services that may be of interest to you. (See section for “**Recipients of HPF electronic messages**”).

### **Who will HPF share your Personal Information with?**

HPF will not sell, rent or trade your Personal Information to any third party and will only share your Personal Information with:

- I. Other HPF entities.
- II. Third party service providers, who process data on HPF’s behalf or who facilitate or are outsourced one or more aspects of the operation of the websites or the business such as our website providers and IT providers.
- III. Specific third parties in the context of a merger, acquisition, or sale of all or a portion of HPF assets. In such cases, due notifications, as required by law, will be made.
- IV. Third parties where HPF is required by law, such as to comply with a subpoena, or similar legal process in any country where HPF operates or to conduct any similar sharing permitted by applicable law.

## Potential Or Existing Clients Or Business Partners

### What information may HPF collect?

- Your name
  - Your surname
  - Title.
  - Company.
  - Email address.
  - Phone number
  - Country
- 
- Information gathered from public sources such as internet searches and our websites

### How will HPF collect your Personal Information?

- I. Through requests or inquiries to HPF through e-mail, mail, social media sites or affiliated blogs.
- II. Through a business event or conference.
- III. In person (for example, if you provide your business card to a HPF employee).
- IV. Provisions of services for or otherwise contracting with HPF.
- V. Through the development of business partnerships.
- VI. At the occasion of visiting HPF offices, facilities or accessing HPF systems.
- VII. Through direct contact with HPF by telephone (voice over IP (VOIP) telephones may capture your Personal Information).
- VIII. From public sources, such as internet searches, your company website and social media sites (such as LinkedIn and Twitter through questions, answers, comments and retweets between you and HPF).

### What does HPF use your Personal Information for?

HPF uses the Personal Information it is provided with for legitimate business purposes, including to enter into or perform obligations under the contract HPF holds with you, or to engage with clients and business partners, to deliver its professional services, or as otherwise permitted by applicable law. The following are examples of the ways HPF uses your Personal Information for business purposes:

- I. To provide professional services.
- II. To engage you as a business partner.
- III. To manage HPF's business relationship with you or your employer.

- IV. To comply with legal obligations.
- V. To investigate and prevent fraud or misconduct.
- VI. To issue communications or billings around projects, contracts or joint endeavors.
- VII. To pursue or contract for work.
- VIII. To evaluate prospective service providers.
- IX. To answer questions and inquiries related to services of either party.
- X. To otherwise conduct everyday business activities, such as business development, business planning, strategic reviews and statistical, evaluation and reporting purposes.
- XI. To contact you about other HPF information and services that may be of interest to you. (See section for "**Recipients of HPF electronic messages**").
- XII. All other areas where we have a legitimate interest and legal basis for processing.

#### **Who will HPF share your Personal Information with?**

HPF will not sell, rent or trade your Personal Information to any third party and will only share your Personal Information with:

- I. Other HPF entities.
- II. Specific third parties in the context of a merger, acquisition, or sale of all or a portion of HPF assets. In such cases, due notifications, as required by law, will be made.
- III. Third party service providers, who process data on HPF's behalf or who facilitate or are outsourced one or more aspects of the operation of the websites or the business. Third party service providers include IT service providers, lawyers in connection with actual or threatened litigation, and auditors.
- IV. HPF business partners who provide services to our clients.
- V. HPF clients where you are a business partner.
- VI. Third parties where HPF is required by law, such as to comply with a subpoena, or similar legal process in any country where HPF operates.
- VII. To third parties when it is reasonably believed that disclosure is necessary to protect people's safety, security, rights or property, or as otherwise permitted by applicable law.
- VIII. To the police or financial crime and fraud detection agencies to investigate fraud or corruption, or to conduct any similar sharing permitted by applicable law.
- IX. To a government entity in response to a government request.

X. To Building management companies in order for you to gain access to our buildings.

## Potential Or Existing Job Applicants

HPF collects and processes your Personal Information when you apply for a job at HPF, including for applications made on the HPF Careers website. In accordance with applicable law, HPF may keep the information you submit in connection with an application for employment and for future consideration.

### What Information may HPF collect?

- Your name.
- Address.
- Contact details.
- Education background.
- Employment history.
- Reference or results of employment checks.
- Your resume (CV).
- Information obtained from your cover letter and in the context of your job application.
- Eligibility to work.

All information provided in job applications must be accurate and any errors may result in withdrawal of an offer of employment or termination of employment.

### How will HPF collect your Personal Information?

- I. Directly from you when you provide it in your resume (CV) or in the context of a job application.
- II. From HPF Careers webpages.
- III. From references you provide.
- IV. From references received from third parties such as education institutions or your current or past employers.
- V. From employment checks, including from publicly available sources, such as Google and LinkedIn.

### What does HPF use your Personal Information for?

HPF uses the Personal Information it is provided with for legitimate business purposes, including to enter into an employment relationship with you, and because there is a legitimate business need to assess job applications or as otherwise permitted by applicable law. The following are examples of the ways HPF uses your Personal Information for business purposes:

- I. To consider your application and assess your suitability for the position applied for or for other suitable positions that might match your profile.
- II. To check/obtain information or references about you from third parties.
- III. To inform you of job opportunities, forums, actions or publications that might be of interest to you, as requested.
- IV. To review and assess HPF's hiring policies, practices and statistics.

#### **Who may HPF share your Personal Information with?**

HPF will not sell, rent or trade your Personal Information to any third party and will only share your Personal Information with:

- I. Other HPF entities.
- II. Specific third parties in the context of a merger, acquisition, or sale of all or a portion of HPF assets. In such cases, due notifications, as required by law, will be made.
- III. Third parties contacted by HPF to verify your information and to obtain references such as your previous employers or education institutions.
- IV. Third party service providers which HPF uses as part of the job application process.
- V. Third parties where HPF is required by law, such as to comply with a subpoena, or similar legal process in any country where HPF operates, or to conduct any similar sharing permitted by applicable law.

#### **RECIPIENTS OF HPF ELECTRONIC MESSAGES**

When you provide contact data to HPF, including through HPF websites, such as name and email address, HPF may send you commercial electronic messages (such as emails) related to its services. If you receive such messages from HPF, you may be in a business relationship with HPF, you may have provided express or implied consent to receive commercial electronic messages from HPF, or the electronic communication may not be subject to legal consent requirements. You may opt out of receiving marketing related electronic messages by clicking on the unsubscribe link contained in the footer of the message or by sending a blank email to [unsubscribe@hurleypalmerflatt.com](mailto:unsubscribe@hurleypalmerflatt.com). Please note that even if you opt-out of commercial electronic messages, HPF may still need to contact you electronically with information about its business relationship with you, your account or data.

## Worldwide Processing and Transferring of Personal Information

HPF operates globally and has worldwide affiliates. When you give HPF your Personal Information, it may be transferred, processed and stored on servers in other countries in which HPF operates and therefore, your data may be available to government authorities under lawful orders and laws applicable in such foreign jurisdictions.

To that extent, such Personal Information may not be afforded the same protections as under the laws of the jurisdiction in which you reside.

International transfers of Personal Information are subject to appropriate security measures and HPF will take all reasonable steps to ensure that your Personal Information is protected and maintained in accordance with this Privacy Policy and applicable data privacy laws. By providing your Personal Information to HPF you consent to HPF's transmission to, and processing of, your Personal Information in any jurisdiction.

### European Economic Area and Switzerland ("Europe")

Where HPF transfers data collected in Europe to locations outside of Europe, HPF takes the appropriate steps to ensure that your Personal Information is protected, notably by:

Using particular contractual clauses otherwise known as 'standard contractual clauses' which have been approved by the European Commission or through a HPF internal contractual commitment.

You can request more details about this by contacting: [privacy@hurleypalmerflatt.com](mailto:privacy@hurleypalmerflatt.com)

or

Transferring to countries that have been deemed 'adequate' by the European Commission.

## Protecting of your Personal Information

HPF employs reasonable and customary security measures and technologies to keep your Personal Information secure and protected against loss, misuse, and unauthorised access, disclosure, alteration and destruction. Where third party vendor organisations process Personal Information on HPF's behalf (e.g., payroll or outsourcing companies), specific security arrangements will be implemented, when required, through contractual arrangements with those organisations.

HPF may use your email address to contact you about a security incident involving your Personal Information.

E-mail monitoring or blocking software may be used for security purposes and for compliance with HPF policies.

## Links to Other Websites

HPF websites may also contain links to other web sites or services which are outside HPF's control and are not covered by this Privacy Policy. If you access or share data to other sites using the links provided, the operators of these sites may collect data from you which will be used by them in accordance with their privacy policy, which may differ from ours. HPF is not responsible or liable for the privacy standards and practices of third parties. Your use of such websites is at your own risk.

### Social Media

Any information you post or disclose on HPF's social media or community forums (for example, YouTube, Twitter, or other social media applications) is public. HPF cannot control the use of information disclosed in social media platforms or HPF community forums. Exercise caution when disclosing information in public areas and be careful what Personal Information you disclose and how you disclose it. Content posted in HPF's community forums, including advice and opinions, represents the views of the individuals who post that content and such individuals bear sole and exclusive responsibility for the posting of that content. HPF does not necessarily endorse, support, verify, or agree with any content posted on our social media or community forums.

### Social Media Widgets

HPF websites include social media widgets, such as the Facebook, YouTube, LinkedIn, Instagram, Google + and Twitter buttons and widgets, such as the "Share" button. Social Media widgets are either hosted by a third party or hosted directly on HPF's website. Your interactions with these widgets are governed by the privacy policy of the company providing it. These widgets may collect your IP address, which HPF webpage you are visiting, and may set a cookie to enable the feature to function properly.

## The Cloud

HPF may store your Personal Information in a cloud. This means that your Personal Information may be processed on HPF's behalf by a cloud provider and could be stored in different locations around the world. HPF makes use of organisational and contractual measures to protect your Personal Information and to impose appropriate security and data protection requirements on our cloud services providers, including the requirement that your Personal Information be processed exclusively for the purposes set out in this Privacy Policy.

## Phones

HPF uses VOIP technology when you communicate with HPF over the telephone. As your call will be relayed via the internet, HPF cannot control where your data is processed.

## Retention

HPF retains your Personal Information for no longer than is necessary. HPF will further retain and use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce agreements. For example, HPF usually retains customer information as long as we need to provide services, and for a period of 12 years after the business relationship ends, unless otherwise compelled by the law to retain such information, or in the case of a litigation, or potential litigation.

## Your Rights as a Data Subject

In accordance with applicable law, you have the following rights, subject to some conditions and exceptions:

- I. To object to the processing of your Personal Information for direct marketing purposes. To exercise this right, please contact the HPF Privacy Office at any time or, to opt out of commercial electronic messages, click on the unsubscribe link at the bottom of the message or send a blank email to [unsubscribe@hurleypalmerflatt.com](mailto:unsubscribe@hurleypalmerflatt.com)
- II. Right of access: To access a copy of your Personal Information and details about how HPF uses it.
- III. Right of Rectification: To have your Personal Information corrected or updated.
- IV. Right to be forgotten: To request deletion of your Personal Information. If HPF receives such a request, other factors will need to be taken into account when assessing whether to comply.
- V. Right to restriction of processing: To request restriction of processing of your Personal Information, for example where you believe that the Personal Information we have about you is inaccurate and we need to verify it
- VI. All requests regarding your Personal Information should be sent to the Global Chief Privacy Officer. .
- VII. HPF will respond to such requests within thirty (30) business days of their receipt or within any other delay required or authorised by applicable law. HPF will take reasonable steps to functionally correct or delete your Personal Information from HPF database(s) upon request, although HPF may keep a copy for archival purposes in compliance with applicable laws. Before HPF provides you with any data, corrects any inaccuracies or deletes any data, HPF may request additional information to verify your identity or otherwise help respond to your request.

## European Economic Area and Switzerland ("Europe")

Where you are engaging with a HPF entity in Europe, European data protection laws, including from 25 May 2018 the General Data Protection Regulation ("GDPR") and other national data protection legislation in Europe, grant you the following additional rights:

- I. The right to lodge a complaint regarding HPF's compliance with data protection laws with the appropriate member state data protection regulator.
- II. The right to withdraw consent where HPF relies on consent to process your Personal Information

## Compliance

HPF complies with this Privacy Policy as well as applicable laws, including the Electronic Documents Act and European data protection laws, including from 25 May 2018 the General Data Protection Regulation ("GDPR") and other national data protection legislation in Europe.

Except where listed herein HPF will not pass on your personal data to third parties without first obtaining your consent.

## Contact Us

If you have any questions, complaints or concerns about privacy or the security of your Personal Information, please contact the HPF Privacy Office. Where relevant or required, HPF will collaborate with the appropriate regulatory authorities to resolve any complaints or issues regarding Personal Information.

### Privacy Office:

Jay Amin  
Global Chief Privacy Officer  
Hurley Palmer Flatt Ltd  
240 Blackfriars Road  
London  
SE1 8NW  
United Kingdom

Email: [privacy@hurleypalmerflatt.com](mailto:privacy@hurleypalmerflatt.com)

Contact number: + 44 20 7429 3333

## Changes to this Policy

HPF may need to make changes to this Privacy Policy from time to time to reflect any changes in data protection and privacy laws and to update you on HPF's privacy practices.

This Privacy Policy was last updated in May 2018.