



## Privacy policy

This privacy policy explains how we process your personal data when you use our website, [www.s4capital.com](http://www.s4capital.com). If you have any questions or comments about this privacy policy, please let us know by email: [info@s4capital.com](mailto:info@s4capital.com).

The website is operated by S<sup>4</sup>Capital Plc ("**we**", "**us**" and "**our**"), a company incorporated and domiciled in the UK with the registered number 10476913 and registered office at 12 St James's Place, London SW1A 1 NX. We are the 'data controller' (i.e. the company which decides the means and purpose for the processing of your personal data) for the purpose of applicable data protection law.

### How we use your personal information

/ If you contact us about our services, the emails you send may include information about you, such as your name, address, email address, telephone number, your organisation's address and your enquiry. We use this information to respond to your enquiries.

/ In line with the legitimate interest we have in promoting our business, we will process your enquiries to provide you with information about the services we (or, where applicable our group companies) offer, including replying to your enquiry.

/ We may also process enquiries to take steps you ask of us (or, where applicable our group companies) with a view to entering into and/or performing a contract with you to provide you with our services.

/ If you send us objectionable content or otherwise behave in a disruptive manner when using our website, we may process personal data included in your messages to respond to and stop such behaviour. We only process personal data in this way for the legitimate interests of ensuring that use of our Website is lawful, does not itself disrupt, does not harass our staff or other individuals, and to enforce our legal rights and to comply with our legal obligations.

/ You are under no obligation to provide us with any details, but if you don't provide all relevant information, we may not be able to help.

## How you use our website

/ Our website uses cookies and other mechanisms to collect log and analytical information, such as your internet protocol (IP) address, to help analyse how visitors use the site and to compile statistical reports on website activity.

/ We process this information to understand how visitors use our website and to compile statistical reports regarding that activity (for example, your IP address is used to approximate the country from which you access our website, and we aggregate this information together so we know that, for example, most of the visitors to our website come from Europe.

/ This processing is necessary for us to pursue our legitimate interests in improving our website and providing a better service and source of information to visitors.

/ This information is not used to develop a personal profile of you. All such information is aggregated and stored anonymously.

## Children

/ We do not use the Website to knowingly solicit data from children under the age of 13. If a parent or guardian becomes aware that their child has provided us with information without their consent, the parent or guardian should contact us at [info@s4capital.com](mailto:info@s4capital.com). We will delete such information within a reasonable time.

## Transfers of your information

/ We keep your personal data confidential, but we may transfer your data outside of UK to our S<sup>4</sup>Capital group companies or to other third parties where reasonably necessary or we have the right to do so under applicable data protection law. Such transfers will be made in accordance with applicable data protection law and, where transfers are made outside the EEA or, after the Brexit transition period, the UK, only where we have a written agreement in place.

/ We may disclose your information to our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this privacy policy, provided that they do not make independent use of the information, and have agreed to take measures to protect your personal information that are substantially similar to those set out in this privacy statement.

/ In addition, we may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention or where content you send amounts to harassment or is defamatory).

/ If the transferee is located outside the EEA, or, after the Brexit transition period, the UK, we shall ensure that appropriate safeguards are put in place to protect your personal data

according to applicable data protection law, including, where applicable, incorporating the standard data protection clauses adopted by a data protection regulator and/or approved by the European Commission (or, after the Brexit transition period, any applicable UK-based equivalent) into the applicable contract. You have the right to request a copy of the relevant sections of such contract relating to the safeguards applied to such transfer.

/ If you would like to find out more about these safeguards, please let us know by writing to [info@s4capital.com](mailto:info@s4capital.com).

## Your rights

/ You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest. You may ask for a copy of data we are processing about you and have inaccuracies corrected; ask us to restrict, stop processing, or to delete your personal data; withdraw your consent to such processing (where we rely on such consent to process your personal data); request a machine-readable copy of your personal data, which you can use with another service provider (where it is technically feasible, you can ask us to send this information directly to another provider if you prefer); and to make a complaint to a data protection regulator. Please send your requests to: [info@s4capital.com](mailto:info@s4capital.com).

## How long we hold your data

/ We will hold your personal data on our systems for as long as is reasonably necessary for the relevant purpose, or for only as long as we have the right to do so.

/ Whilst we will take all reasonable steps to protect your personal information, we cannot guarantee the security of any personal information you disclose online. You accept the inherent security implications of disclosing personal information online and will not hold us responsible for any breach of security unless such breach has been directly caused by our specific negligence.

## General

/ This policy may be updated from time to time. We will notify you of any changes by posting the new policy here. If you have any questions regarding this privacy policy, please send them to: [info@s4capital.com](mailto:info@s4capital.com).