

## INTRODUCTION

- This Privacy Policy explains what we do with your personal data, whether we are in the process of providing you consultations or continuing a relationship with you once we began providing services to you, using your data to send you our newsletters, invitations and analytics, or you are visiting our website.
- It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.
- It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.
- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

## SHORT FORM “AT A GLANCE” SECTION

### What kind of personal data do we collect?

- **CLIENTS:** In order to provide the best possible services and the most accurate advice and information to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, age, contact details, your employment background, immigration status, nationality/citizenship information, financial information, information about members of your family (as may be appropriate), extra information which you may choose to tell us, IP address, dates, times and frequency with which you access our services, CCTV footage if you attend our premises.
- To the extent that you access our website we will also collect certain data from you. We use “cookies”. A “cookie” is a bite-sized piece of data that is stored on your computer’s hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.
- If you don’t want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.
- Most web browsers will accept cookies but if you would rather we didn’t collect data in this way you can choose to accept all or some, or reject cookies in your browser’s privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website’s features. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.

- For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.
- **WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

A number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Other items may simply be needed to ensure that our relationship can run smoothly. Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

#### How do we collect your personal data?

- **CLIENT DATA:** There are two main ways in which we collect your personal data:
  - 1) Directly from you; and
  - 2) From third parties (e.g., introducers) and other limited sources (e.g. online and offline media).
- To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.
- **WEBSITE USERS:** We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. We will also collect data from you when you contact us via the website, for example by using the chat function.

#### How do we use your personal data?

- **CLIENT DATA:** The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. The more information we have about you, your family, your financial position and other information, the more bespoke we can make our service and provide you with the best possible service.
- **WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing your recent searches and questions that you may ask in the chat to help us send you information and offers that we think you'll be interested in. We may also use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

- Please note that communications to and from our staff, including emails, may be reviewed as part of internal or external investigations or litigation.

#### Who do we share your personal data with?

- **CLIENT DATA:** We will share your data primarily to ensure that we provide you with a best possible and tailored service to you. Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.
- **PEOPLE WHOSE DATA WE RECEIVE FROM CLIENTS, SUCH AS FAMILY MEMBERS, ASSOCIATED PARTIES:** Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.
- **WEBSITE USERS:** Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

#### How do we safeguard your personal data?

- We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

#### How long do we keep your personal data for?

- If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two years, we will Delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

#### How can you access, amend or take back the personal data that you have given to us?

- Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain

roles), or consent to market to you, you may withdraw your consent at any time.

- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
  - we may ask you to verify your identity, or ask for more information about your request; and
  - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with the supervisory authority.
- If your interests or requirements change, you can unsubscribe from part or all of our marketing content by clicking the unsubscribe link in the email, or by updating your preferences [through our preference centre on the Oracle Capital Group website.](#)

#### How do we store and transfer your data internationally?

- Oracle Capital Group is a global organisation – this is what enables us to offer the level of services that we do. In order for us to continue operating in this way, we may have to transfer or store your data internationally.

#### Who is responsible for processing your personal data on the Oracle website?

- Oracle Capital Group controls the processing of personal data on its website(s).

#### What are cookies and how do we use them?

- A “cookie” is a bite-sized piece of data that is stored on your computer’s hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options

tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

- If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

### How to reject cookies

- If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.
- Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.
- For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## LONG FORM DETAILED SECTIONS

### WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the information we may collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

- **CLIENT DATA:** Depending on the relevant circumstances and applicable laws, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

- Name;
- Age/date of birth;
- Sex/gender;
- Photograph;
- Marital status;
- Contact details;

- Employment history;
  - Details of any dependants;
  - Referee details;
  - Immigration status;
  - Nationality/citizenship/place of birth;
  - A copy of your driving licence and/or passport/identity card;
  - Financial information, including source of wealth;
  - Any tax-related information;
  - Extra information that you choose to tell us;
  - IP address;
  - The dates, times and frequency with which you access our services; and
  - CCTV footage if you attend our premises.
- Please note that the above list of categories of personal data we may collect is not exhaustive.
  - **SUPPLIER DATA:** We don't collect much data about Suppliers – we simply need to make sure that our relationship runs smoothly. We'll collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us.
  - **PEOPLE WHOSE DATA WE RECEIVE FROM CLIENTS, SUCH AS DEPENDANTS:** This may include your names, your contact details, your date of birth and other information which the Client chooses to disclose to us.
  - **WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, for example by using the chat function, we will collect any information that you provide to us, for example your name and contact details.

\*\*\*\*\*

## HOW DO WE COLLECT YOUR PERSONAL DATA?

- **CLIENT DATA:** We collect Client personal data in three primary ways:
  1. Personal data that you, the Client, give to us;
  2. Personal data that we receive from other sources; and
  3. Personal data that we collect automatically.

### Personal data you give to us

- Oracle Capital Group needs to know certain information about you in order to provide tailored services and ensure that the advice given to you is appropriate in your circumstances. This will enable us to provide you with highly personalised information, and should save you time in not having to trawl through information and services that are not relevant to you.
- There are numerous ways you can share your information with us. It all depends on what suits you. These may include:
  - Entering your details on the Oracle Capital Group website;
  - Emailing a member of Oracle Capital Group team.

### Personal data we receive from other sources

- We also receive personal data about Client from other sources. Depending on the relevant circumstances and applicable laws and requirements, these may include personal data received in the following situations:
  - Your dependants or associates may disclose personal information about you;
  - We may obtain information about you from searching third party sources, such as LinkedIn and other sites;
  - If you “like” our page on Facebook or “follow” us on Facebook, LinkedIn or Instagram we will receive your personal information from those sites.

### Personal data we collect automatically

- To the extent that you access our website or read or click on an email from us, where appropriate, we may also collect your data automatically or through you providing it to us.
- **WEBSITE USERS:** When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, for example by using the chat function.

- We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Client, we may use data from your use of our websites to enhance other aspects of our communications with or service to you.

\*\*\*\*\*

## HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then use it in a number of ways.

- CLIENT DATA: We generally use Client data in three ways:
  - Providing services;
  - Marketing activities; and
  - To help us to establish, exercise or defend legal claims.

Here are some more details about each:

### Providing Services

- Obviously, our main area of work is to provide you services in those areas in which Oracle capital Group operates. We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any laws and requirements. Please note that this list is not exhaustive.
- - Collecting your data from you and other sources, such as LinkedIn;
  - Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to services which may be of interest to you;
  - Providing you with various services in which Oracle Capital Group operates;
  - Enabling you to subscribe to alerts about services we think may be of interest to you;
  - Allowing you to participate in specialist online training, including webinars;
  - Allowing you to participate in the interactive features of our services, when you choose to do so;
  - Carrying out our obligations arising from any contracts entered into between us;
  - Carrying out our obligations arising from any contracts entered into between Oracle Capital Group or any entities within the Group and third parties in relation to providing services to Client;
  - Facilitating our invoicing processes;
  - Carrying out customer satisfaction surveys;
  - Verifying details you have provided, using third party resources;



- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.
- We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object.

#### Marketing Activities

- We may periodically send you information that we think you may find interesting. In particular, we may wish to use your data for the purposes listed below, where appropriate. Please note that this list is not exhaustive.

To:

- enable us to develop and market other products and services;
- send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
- display promotional excerpts from your details on Oracle Capital Group's entities website(s) as a success story (only where we have obtained your express consent to do so); and
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Oracle Capital Group.
- We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below).
- Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us and we are marketing other services which are related to the services in which you were initially interested. Under "soft opt-in" consent, we will take your consent as given unless or until you opt out. For other types of e-marketing, we are required to obtain your explicit consent.
- If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time. Nobody's perfect, even though we try to be. We want to let you know that even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we're sorry. We'd just ask that in those

circumstances you opt out again.

- All our marketing is based on what we think will serve our Clients best, but we know we won't always get it right for everyone. We may use your data to show you Oracle Capital Group adverts and other content on other websites, for example Facebook. If you do not want us to use your data in this way, please turn off the "Advertising Cookies" option. Even where you have turned off advertising cookies, it is still possible that you may see an Oracle Capital Group advert, but in this case it won't have been targeted at you personally, but rather at an anonymous audience.

To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

\*\*\*

- **SUPPLIER DATA:** We realise that you're probably busy, and don't want us to be contacting you about all sorts of things. To find the right balance, we will only use your information:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;

- To offer services to you or to obtain support and services from you;

- To perform certain legal obligations;

- To help us to target appropriate marketing campaigns; and

- In more unusual circumstances, to help us to establish, exercise or defend legal claims.

- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

- We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.

- If you are not happy about this, in certain circumstances you have the right to object.

\*\*\*

- **PEOPLE WHOSE DATA WE RECEIVE FROM CLIENTS, SUCH AS DEPENDANTS AND EMERGENCY CONTACTS:** We will only use the information that our Client gives us about you for the following purposes:

- If our Client or Staff members put you down on our form as a dependant or an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or

- If you were put down by our Client as a dependant, we may sometimes use your details to contact you in relation to our services that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Clients.

- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.
- If you are not happy about this, you have the right to object.

\*\*\*

- WEBSITE USERS: We use your data to help us to improve your experience of using our website, for example, by analysing your recent searches to help us to present such services that we think you'll be interested in.

\*\*\*\*\*

## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

- Where appropriate, we may share your personal data, in various ways and for various reasons, with the following categories of people:
  - Any of our group companies;
  - Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
  - Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
  - Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
  - Marketing technology platforms and suppliers;
  - If Oracle Capital Group merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

\*\*\*\*\*

## HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

- We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.
- If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

\*\*\*\*\*

## HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- We will delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.
- When we refer to “meaningful contact”, we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a Client we will consider there to be meaningful contact with you if you provide your updated KYC documents, request any services from us, request that we comment on any news or legal update or take part in any of our webinar. We will also consider it meaningful contact if you click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

\*\*\*\*\*

## HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

- One of the GDPR’s main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.
- To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- Right to object: this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

- The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply to our Website Users, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
  - we can show that we have compelling legitimate grounds for processing which overrides your interests; or
  - we are processing your data for the establishment, exercise or defence of a legal claim.
- If your objection relates to direct marketing, we must act on your objection by ceasing this activity.
- Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.
- Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is “manifestly unfounded or excessive”. If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.
- Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:
  - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
  - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
  - the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
  - it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
  - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

- We would only be entitled to refuse to comply with your request for one of the following reasons:
  - to exercise the right of freedom of expression and information;
  - to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
  - for archival, research or statistical purposes; or
  - to exercise or defend a legal claim.
- When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.
- Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.
- The circumstances in which you are entitled to request that we restrict the processing of your personal data are:
  - where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
  - where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
  - where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
  - where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.
- If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.
- Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is

impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.
- If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found on Oracle Capital Group webpage. Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- You may ask to unsubscribe from our marketing materials or electronic communications at any time.
- It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

\*\*\*\*\*

#### WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON ORACLE CAPITAL GROUP WEBSITE?

- Oracle Capital Advisors is responsible for processing your personal data. If you have any comments or suggestions concerning this Privacy Policy please contact us immediately. We take privacy seriously so we'll get back to you as soon as possible.

\*\*\*\*\*

#### HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

- So you want to know more about how we store and transfer your data internationally? In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred:
  - between and within Oracle Capital Group entities;
  - to third parties (such as advisers or other Suppliers);
  - to a cloud-based storage provider;
  - website developers, marketing specialists who can be based abroad.

- We want to make sure that your data are stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:
  - by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
  - transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
  - where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Client of ours); or
  - where you have consented to the data transfer.
- To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

\*\*\*\*\*

## COOKIES POLICY

What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.
- Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the Oracle Capital Group website.

How do we use cookies?

- We use cookies to do two things:



- to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need; and

- to help us advertise services to you that we think you'll be interested in. Hopefully this means less time for you trawling through endless pages and will get you the services and advice you want more quickly.

- Cookies are either:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or

- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).

- Cookies can also be categorised as follows:

- Strictly necessary cookies: These cookies are essential to enable you to use the website effectively and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

- Functionality cookies: These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

\*\*\*\*\*

## **OUR LEGAL BASES FOR PROCESSING YOUR DATA LEGITIMATE INTERESTS**

- Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it “is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.”

- We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, so everyone's a winner! However, you do have the right to object to us processing your personal data on this basis.

- CLIENT DATA:

- To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, services requested. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

\*\*\*

- SUPPLIER DATA:

- We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

\*\*\*

- PEOPLE WHOSE DATA WE RECEIVE FROM CLIENTS AND STAFF, SUCH AS DEPENDANTS:

- If a Client or Staff member has given us your details as a dependant or an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

\*\*\*\*\*

## CONSENT

- In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

- Article 4(11) of the GDPR states that (opt-in) consent is “any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.” In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;

- you have to know what you are consenting to – so we'll make sure we give you enough information;

- you should have control over which processing activities you consent to and which you don't; and

- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

- We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to other services which we already provide to you presently as long as you do not actively opt-out from these communications.
- As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, please contact us should you wish to do so.

#### ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

- Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".
- This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

#### GLOSSARY

- *Clients* - while it speaks for itself, this category covers our customers, clients, and others to whom Oracle Capital Group companies provide services in the course of its business.
- *Delete* – while we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of our operational systems, processes or Staff.
- *General Data Protection Regulation (GDPR)* – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

- *Staff* – includes employees and interns engaged directly in the business of Oracle Capital Group (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to Oracle Capital Group companies (even though they are not classed as employees). Independent contractors and consultants performing services for Oracle Capital Group fall within the definition of a “Supplier” for the purposes of this Privacy Policy.
- *Suppliers* – refers to partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to Oracle Capital Group. In certain circumstances Oracle Capital Group will sub-contract the services it provides to Client to third party suppliers who perform services on Oracle Capital Group’s behalf.
- *Website Users* - any individual who accesses any of the Oracle Capital Group websites.