

Alten Limited Website Transparency Notice

Alten Limited is a company registered in England and Wales with Company Number 08452862 and registered office 1st Floor 41 Moorgate, London, United Kingdom, EC2R 6PP.

1. What is the purpose of this document?

- 1.1 We are committed to protecting and respecting your privacy. This transparency notice sets out the basis on which we collect any personal data about users of our website at <https://www-alten-co-uk.altengroup.website/> (our **site**), or that you otherwise provide to us during our relationship with you, and how this will be processed by us.
- 1.2 This transparency notice applies to: visitors to our site who do not register as well as those who do; any clients or prospective clients who contact us via our site or otherwise; individual investors; and all individual candidates, consultants, contractors and service providers who provide services to our business (**you**).
- 1.3 If you are an employee, consultant, designer or other worker providing services on behalf of Alten, please see out transparency notice for staff, available from our HR Team.
- 1.4 We are a **data controller**. This means that we are responsible for deciding how we hold and use personal information about you, and for explaining this clearly to you.
- 1.5 Please read this transparency notice carefully to understand what we do with your personal information and what rights you have in relation to our activities.

2. What is personal data and our lawful basis for processing

- 2.1 Personal data, or personal information, means any information relating to an individual from which that person can be identified. There are special categories of more sensitive personal information which require a higher level of protection (see further at section 4, below).
- 2.2 We will only use your personal information when the law allows us to. Our principle lawful basis for processing is set out in the table below. However, some of our grounds for processing will overlap and there may be several grounds which justify our use of your personal information.
- 2.3 We may only rely on our legitimate interests (or those of a third party) to process your personal information, if your interests and fundamental rights do not override those interests. Where we rely on legitimate interests for our processing, we have set out the relevant interest, below.
- 2.4 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 2.5 Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

3. Information we collect from you and about you and how our use complies with the law

Information we collect from you		
Information	How we use your information	How our use complies with the law
We collect your name, address and contact details (including email).	<p>To provide you with services.</p> <p>Where we are permitted to do so, to provide you with information and updates about the services we offer and those of our Group.</p>	<p>This information is necessary to enter and to perform the contract between us.</p> <p>With your consent (where applicable) otherwise for the legitimate interest of promoting our business, provided that you have not asked us to stop sending you marketing.</p> <p>Where we rely on our legitimate interests we do so as long as our interests do not disproportionately intrude on your privacy.</p>
Anti-Money Laundering and Know Your Client information (see further below).	To verify your identity.	We do this to comply with our legal obligations and as necessary for the legitimate interest of understanding who we are contracting with.
Direct Debit or other payment information.	To enable us to reference your payment to your account.	Because it is necessary to perform the contract we have agreed with you.
Personal information contained in documents provided to us by you as part of our consultancy services.	To provide the service.	Such processing is necessary for the purpose of providing advice and to perform our contract with you.
Your marketing preferences and details of any services you have subscribed to and/or events you	To manage the relationship between us.	Such processing is necessary for the legitimate interest of promoting and growing our

have attended.		business.
The content of any messages you send us.	To enable us to respond to your queries.	For our legitimate interest of managing and improving our business.
Feedback you provide to us on our services.	To review and improve our services.	Such processing is necessary for the legitimate interest of managing our business and improving our services.
For corporate clients and prospective clients, we collect the name, job title and business contact information of your individual employees and other representatives.	To provide our services.	This information is necessary to enter and to perform the contract between us and our client.
For corporate suppliers and prospective suppliers of services to our business, we collect the name, job title and business contact information of your individual employees and other representatives.	To receive your services.	This information is necessary to enter and to perform the contract between us and our supplier.
We use the business contact information provided for individual employees and other representatives of our clients and suppliers (including prospective clients and suppliers) to provide updates and information about our services.	We only send direct marketing by email to corporate addresses if the individual has not opted out of receiving marketing from us.	Such processing is necessary for the legitimate interest of promoting our business.
We may perform due diligence in the form of credit checks on companies, including checking photographic identification and proof of address of directors and, in some cases, your shareholders, and verifying their identity using publicly available sources, such as companies house.	For the purposes of fraud protection and credit risk reduction and to maintain the reputation of our business.	Such processing is necessary for the legitimate interest of protecting our business.

Information we collect about users of our website		
Information about your preferences and the types of services you are interested in via the cookies on our website.	<p>To improve the services we offer to you and others.</p> <p>To provide you with information about other products and services which we think may be of interest to you.</p>	<p>As necessary for our legitimate interests to ensure the smooth running of our website.</p> <p>With your consent (where applicable) otherwise for the legitimate interest of promoting our business, provided that you have not asked us to stop sending you marketing.</p>
Background information relating to our past dealings with you.	To inform and improve our service.	For the legitimate interest of informing and improving the service we provide to you.
Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform via cookies on our website (see further below).	<p>To improve the services we offer to you and others.</p> <p>For the purposes of fraud protection and credit risk reduction.</p>	<p>It is necessary for our legitimate interests to ensure the smooth running of our website.</p> <p>You can disable cookies on your browser.</p>
Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page.	<p>To improve the services we offer to you and others.</p> <p>For the purposes of fraud protection and credit risk reduction.</p>	<p>It is necessary for our legitimate interests to ensure the smooth running of our website.</p> <p>You can disable cookies on your browser.</p>
Information we receive from third parties		
Confirmation of payments you have	To confirm	Because it is necessary to

made via our payment service provider.	payment.	perform the contract we have agreed with you.
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4. Special Category Data

- 4.1 We do not process particularly sensitive personal information about our clients and suppliers as part of our usual course of business. However, we may process information:
- 4.1.1 relating to a health condition or disability in order to meet our legal obligation to make reasonable adjustments in the provision of our services;
 - 4.1.2 to ensure meaningful equal opportunity and diversity and inclusion monitoring and reporting;
 - 4.1.3 where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent;
 - 4.1.4 where it is necessary to establish, exercise or defend a legal claim;
 - 4.1.5 where you have manifestly made the information public; or
 - 4.1.6 otherwise with your explicit consent.

5. Sharing your information

- 5.1 We share your personal information with third party consultants, designers and other service providers to the extent necessary to provide our services.
- 5.2 We share your information with other third parties as follows:
- 5.2.1 our regulators, professional advisors and auditors;
 - 5.2.2 HMRC or other government or law enforcement agencies;
 - 5.2.3 our insurance provider;
 - 5.2.4 other members of Alten Group (for the purpose of managing our business);
 - 5.2.5 if we sell any business or assets, in which case we may disclose your personal information to the prospective buyer of such business or assets;
 - 5.2.6 if we have a legal obligation to do so; and
 - 5.2.7 for the purposes of fraud protection and credit risk reduction.
- 5.3 If you object to our sharing or continuing to use your personal data with any specific third party please contact us at dpc@alten.co.uk
- 5.4 We share your data with third-party service providers, such as our payment service providers, our website host server, IT support and maintenance service, cloud storage provider and email exchange server and other businesses that provide certain services on our behalf. All of our third-party service providers are required to take appropriate security

measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes.

6. If you fail to provide personal information

- 6.1 You are required to provide the personal information set out in section 1 of the table. Without this we will not be able to provide our services to you.
- 6.2 We want to be sure that the personal information we hold about you is accurate and current. Please contact dpc@alten.co.uk to update your details.

7. Automated decision-making

- 7.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.
- 7.2 We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

8. Data security

- 8.1 We have put in place:
 - (a) Appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
 - (b) Procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.
- 8.2 Any personal information that we collect about you will be held on secure servers, based within the UK or the European Economic Area (EEA).
- 8.3 If we are required to transfer information outside the EEA, we have put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.
- 8.4 If you are based outside the EEA we may transfer personal information to the correspondence address you provide to us. We will take all reasonable steps to ensure that such transfers are secure. By instructing us from outside the EEA you acknowledge and agree that such transfers are necessary for us to provide services to you.

9. How long will we keep your personal information for?

- 9.1 We will only keep your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 9.2 Where a minimum retention period is required by law (such as retaining records for HMRC purposes) we comply with that minimum period plus up to 12 months to allow time for us to anonymise or delete information in accordance with our internal data management processes.
- 9.3 Emails are kept for up to 5 years on our back-up email exchange server.
- 9.4 Information relating to our contract with you, including payment data, may be retained for up to 7 years after termination of the contract.

10. Anti-Money Laundering and Know Your Client information

- 10.1 We are required by law to verify the identity of all new Clients and, in certain circumstances, existing Clients. In addition, our internal requirements may require us to conduct background checks on new or existing Clients. These may necessitate verification of the identity and good standing of Clients. For corporate Clients this will include verifying one or more of their directors or other officers, and verifying the identity of shareholders, beneficial owners, management and/or other relevant background information.
- 10.2 We may require evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with Clients, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from the prospective or current Client, or through the use of online sources, or both. We may also be required to make detailed enquiries of any unusual transactions such as the transfer of large amounts of cash.
- 10.3 In some circumstances we may decline to, or may not be permitted to, act until such procedures have been completed. We reserve the right to decline to act or, if appropriate, cease to act, should these procedures not be completed to our satisfaction.
- 10.4 Where we instruct counsel or other professionals on behalf of Clients, they may request us to provide them with copies of evidence of identity of Clients or their representatives which we have obtained from you or from other sources. We will be entitled to send such copies to them if we so decide.

11. Your rights

- 11.1 You have the following rights:
- 11.1.1 to be told what we are doing with your personal information. We do this by providing you with this transparency notice;
 - 11.1.2 to correct or update the personal information we hold about you;
 - 11.1.3 to object to the processing of your personal information;
 - 11.1.4 to request a copy of the personal information we hold about you;
 - 11.1.5 to ask us to delete the information that we hold about you where there is no good reason for us continuing to process it. If we delete your personal information or restrict our use of it, we will not be able to provide our services to you;
 - 11.1.6 to ask us to stop processing your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
 - 11.1.7 to ask us to restrict how we use your personal information for a period of time if you claim that it is inaccurate and we want to verify the position or in some limited other circumstances;
 - 11.1.8 to ask us to send your personal information to another organisation in a computer-readable format;
 - 11.1.9 to complain to the Information Commissioner's office if you are unhappy with our use of your personal data: you can do this at <https://ico.org.uk/concerns/>. Do contact us straight away if you consider that we are not handling your personal information properly so we can try and sort the problem out.

- 11.2 If you want to exercise any of your rights, please contact dpc@alten.co.uk. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

12. Cookie policy

- 12.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Information about our use of cookies

- 12.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 12.3 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.
- 12.4 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Google Analytics:

- 12.5 We also use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate visitors' use of our site.
- 12.6 For more information on Google Analytics please go to:

https://www.google.com/analytics/analytics/#?modal_active=none

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