

hh global[®]



Privacy and Cookies Policy

Global

Last Updated: 30 June 2025

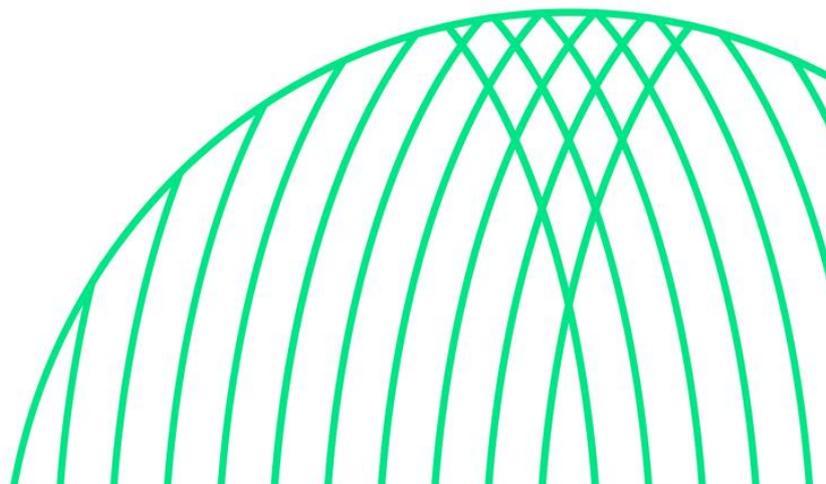


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Policy Release Notes

The monitoring of performance and effective delivery of this Policy will be undertaken by the ISR team. This Policy will be reviewed annually and signed off by the ISR Team. Key changes and updates from the previous version of this policy are highlighted below:

Policy Owner: Nick Doyle

Version: 4.0

Update Date: 30 June 2025

Next Review Date: 30 June 2026

Input From: ISR and DPO

Final Sign-off By: Nick Doyle

Intended Audience: This document must not be reproduced in whole or in part or otherwise disclosed without prior written consent. The official controlled copy of this document is the digital document on the network, visible to all authorized users. All printed copies and electronic versions, except the one described above, are considered uncontrolled, and should be used for reference only.

Introduction

HH Global respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how HH Global collects and processes your personal data through your use of this website, including any data you may provide through this website.

This website is not intended for **children**, and we do not knowingly collect data relating to children.

For the purposes of this policy, '**children**' refers to individuals who have not reached the age of majority as defined by the laws of their place of residence. Where local laws provide different thresholds for online consent, the most protective applicable standard will apply.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing



personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

HH Global applies the UK GDPR as a global privacy standard together with global data protection law in the countries where it operates. In countries where the UK GDPR conflicts with local law, local law that meets internationally accepted privacy principles will take precedence.

Data controller

HH Global is made up of different legal entities. This privacy notice is issued on behalf of the HH Global Group so when we mention “HH Global”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the HH Global Group responsible for processing your data. HH Global Ltd is the data controller.

If you have any questions about this privacy notice, please contact the data protection department.

You have the right to raise a complaint with your supervisory authority at any time. However, we encourage you to contact us first if your concern remains unresolved, and we will ensure it is acknowledged promptly.

Under the Data (Use and Access) Act 2025 (DUAA), individuals must now raise any concerns about how their personal data is handled directly with us first, before contacting the Information Commissioner’s Office (ICO).

If you have any questions or concerns about how we process your personal data, or if you believe your data protection rights have not been respected, you can submit a complaint to us using the contact details below:

Contact details:

HH Global Ltd

Data.Protection@hhglobal.com

Heron Tower, 110 Bishopsgate London, EC2N4AY, United Kingdom.

+44 208 770 7300

We will acknowledge your complaint and aim to respond within one month. If your complaint is complex or requires more time, we will keep you updated.

Escalating your complaint

If you have raised a complaint with us and are not satisfied with our response, or if you believe we have not handled your complaint appropriately, you may then escalate the matter to the [respective regional data regulatory board here](#).

Changes to the privacy notice and your duty to inform us of changes



It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you such as the details listed below:

First name;

Last name;

Job title;

Company;

Email address;

Location, as detected by IP address;

Telephone number; and

Which topic you are interested in contacting us about in a freeform message field.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

Direct interactions. You may give us your personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Web Portals. When you use our company-owned portals to access services including logging in, managing accounts and purchasing our services

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract, we are about to enter or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and it is not disproportionate to your interests and fundamental rights.

Where we need to comply with a legal or regulatory obligation.

Where you have provided consent for us to do so.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate (having undertaken legitimate interest assessments).

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer or respond to your enquiry and provide any information you request	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interest
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) We also request consent to use cookies.
To use data analytics to improve our website, products/services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and

Purpose/Activity	Type of data	Lawful basis for processing
marketing, customer relationships and experiences		relevant, to develop our business and to inform our marketing strategy) We also request consent to use cookies.
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business) We also request consent to use cookies.

Change of purpose

We will only use your personal data 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 data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

To deliver our services effectively, we may share certain personal data with trusted third-party service providers, including Microsoft, who support us in areas such as cloud hosting, data storage, analytics, and customer relationship management. These providers process data strictly on our behalf and in accordance with our instructions. We ensure that all such partners are contractually bound by data protection agreements that meet the requirements of the UK GDPR, including appropriate safeguards for international data transfers.

International transfers

All exports of data from within the European Economic Area (EEA) to non-EEA countries (referred to in GDPR as ‘third countries’) are unlawful unless there is an appropriate ‘level of

protection for the fundamental rights of the data subjects. Transferring personal data outside of the EEA is prohibited unless one or more of the specified safeguards, or exceptions, apply:

An Adequacy Decision

The European Commission can and does assess third countries, and territories and/or specific sectors within third countries to assess whether there is an appropriate level of protection for the rights and freedoms of natural persons. In these instances, no authorisation is required.

Countries that are members of the EEA but not of the EU are accepted as having met the conditions for an adequacy decision.

A list of countries that currently satisfy the adequacy requirements of the Commission is published in the Official Journal of the European Union.

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide/#:~:text=In%20August%202021%2C%20the%20UK,%2C%20Indonesia%2C%20Kenya%20and%20Singapore.>

Where an adequacy decision is not in place, we will put adequate safeguards in place to ensure that your personal information remains protected in a manner that is consistent with how it would be protected under UK and EU data protection laws. For example, by agreeing standard contractual clauses adopted by the European Commission/ UK Government and undertaking a risk assessment in relation to the importing country.

APAC data transfer

When transferring personal data within the Asia-Pacific (APAC) region, we comply with local cross-border transfer and data-localisation requirements. APAC laws vary significantly, but consent and adequate safeguards are the most consistent requirements.

China (PIPL): Cross-border transfers may require a government security assessment, standard contract filing, or certification. Certain data categories may need to remain stored within China.

Singapore (PDPA): Data may be transferred overseas only where the recipient provides a comparable level of protection, such as through contractual safeguards or binding rules.

Japan (APPI): Transfers require data-subject consent unless the destination is whitelisted or the organisation ensures equivalent protection.

South Korea (PIPA): Cross-border transfers generally require explicit consent and detailed notice to individuals.

Other APAC jurisdictions: Many (e.g., Vietnam, Malaysia, Hong Kong) are consent-centric, while some (e.g., Thailand, Indonesia, Philippines) allow transfers with contractual safeguards ensuring adequate protection.

We apply appropriate safeguards- such as transfer agreements, risk assessments, security controls, and local-law compliance- to ensure your data remains protected when transferred within or outside APAC.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data?

We will only retain your personal data 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.

Details of retention periods for different aspects of your personal data are available in our data retention policy which you can request by contacting us.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

As a data subject, you may have rights regarding your personal data under various data protection laws applicable in your jurisdiction. These rights may include, but are not limited to:

Request access to your personal data.

- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to be informed.
- Right of access.
- Right to opt-out via the Do-Not-Call (DNC) Registry (Singapore)



- Right to withdraw consent.
- Right to Nominate/Next of Kin's right (India/China)
- Right of Grievance Redressal
- Right not to be subjected to Automated Decision Making.
- Right to explanation of processing rules (China/South Korea)

If you wish to exercise any of the rights set out above, please contact us at Data.Protection@hhglobal.com or complete **the following webform**

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within the legally defined timescales for each jurisdiction. Occasionally it may take us longer if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Privacy Notice for U.S. Residents

[For U.S. residents, click here to read our Privacy Notice for U.S. Residents, read our Privacy Notice for U.S. Residents.](#)

Cookies

Our website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. Our cookie bar on our website allows you to accept all or deny all cookies as well as allowing for user preferences to be made on the use of cookies beyond essential. [You can read more about how we use cookies here.](#)

Version History

Date of Change	Change Detail	Version
30 June 2024	Annual peer review.	3
30 June 2025	<ul style="list-style-type: none"> Annual peer review – Rebranded and added version history. Also added data subject rights such as, Right to Nominate, Right of Grievance Redressal, Right not to be subjected to Automated Decision Making. 	4
30 Jan 2026	<ul style="list-style-type: none"> Restructured privacy statement by removing cookies policy content and other minor changes. Added Data (Use and Access) Act 2025 (DUAA) Added Data subject rights such as, Right to be informed. Right of access, Right to opt-out via the Do-Not-Call (DNC) Registry, Right next to Kin’s rights, Right to explanation of processing rules. 	5