



## 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 and your other interactions with us in a business-to-business context.

This policy does not apply to personal data processed in the context of employment, recruitment or similar workforce relationships, which are covered by separate privacy notices. Where this website is used to collect personal data for recruitment purposes (e.g., browsing or applying for roles), please refer to our Employee Privacy Notice.

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 under the age of 18, in line with the UK GDPR and the UN Convention on the Rights of the Child.*

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, including any requests to exercise your rights, please contact our data protection team using the details set out below.

Depending on the context of the interaction, the relevant HH Global entity may act as a data controller or, in some customer engagements, as a data processor acting on behalf of its customers.

### Contact details



Our full details are:

HH Global Ltd

Data.Protection@hhglobal.com

Heron Tower, 110 Bishopsgate, London, EC2N 4AY

You have the right to make a complaint to us at any time in relation to our processing of your personal data. You may do so by contacting us via the email address above. If you are unhappy about the way we have handled your complaint you may also complain to your supervisory authority – e.g. the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## 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:

- Identity and Contact data – such as name, job title, business contact details and organisation.
- Business relationship data – such as records relating to our relationship with customer or prospective customer organisations, account administration details, and related correspondence.
- Transactional and financial data – such as information relating to orders, services provided, invoices, payments and other commercial interactions.
- User and access data – such as user credentials, access permissions and usage information relating to customer-facing platforms or portals where relevant.
- Communications data – including emails, messages and other communications exchanged with us in a business context.



- Technical and website usage data – including IP address, browser information, device identifiers, and information collected through cookies and similar technologies.
- We do not generally seek to collect special categories of personal data through our websites or in the ordinary course of customer interactions, unless this is strictly for the purposes listed below.

## 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.

**Business interactions.** We may collect personal data through our dealings with customer and prospective customer organisations, including through account setup, service delivery, meetings, correspondence and contractual arrangements.

**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.

## 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.

## 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate
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interest

<p>To register you as a new customer and manage our relationship with you as a customer or prospective customer</p>	<p>(a) Identity and contact (b) Communications</p>	<p>(a) Performance of a contract Necessary for our legitimate interests (to maintain and develop customer/prospect relationships; to respond to enquiries and manage communications; to keep records of interactions and account administration).</p>
<p>To deliver services to customers and business partners, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us</p>	<p>(a) Identity and contact (b) Transactional and financial (c) User and access (d) Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to deliver services efficiently and consistently; to administer user accounts and manage access to customer-facing platforms; to support business continuity and service quality; to manage our financial function. and to recover debts due to us where applicable) (c) Compliance with legal obligations (including accounting and tax requirements)</p>
<p>To manage our relationship with you which will include: (a) responding to enquiries and day-to-day business communications (b) Notifying you about changes to our terms or privacy policy (c) Asking you to leave a review or take a survey</p>	<p>(a) Identity and contact (b) Business relationship (c) Communications</p>	<p>(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)</p>
<p>To operate, maintain and improve our websites and to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (to operate, maintain and improve our websites; and to understand how our websites are used and improve user experience; for running our business, provision of administration and IT services, network security, to prevent fraud) (b) consent where required under applicable e-privacy laws (c)</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>(a) 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) , subject to applicable marketing and e-privacy laws and the right to object; and (b) consent where required</p>



To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(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 relevant, to develop our business and to inform our marketing strategy)
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	(a) Necessary for our legitimate interests (to develop our products/services and grow our business) , subject to applicable marketing and e-privacy laws and the right to object; and  (b) consent where required
To operate our business effectively and lawfully, including corporate administration, compliance with legal and regulatory requirements, and managing or defending legal claims	(a) Identity and contact (b) Business relationship (c) Communications	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to run our business efficiently, including corporate governance and administration; in the context of a business reorganisation or group restructuring exercise; to manage legal and regulatory risk; to prevent and detect wrongdoing; and to establish, exercise or defend legal claims)

Not all purposes will apply to every individual. The personal data used will depend on the nature of the interaction with us.

## Cookies

Cookies are small text files that can be used by websites to make a user's experience more efficient. The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies, we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages. You can at any time change or withdraw your consent from the Cookie Declaration on our website.

## Why we use cookies

- Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- Marketing cookies are used to track visitors across websites. The intention is to display



ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

- Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

We do not use the information captured for any other purpose.

## 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 may share certain personal data with third-party service providers where this is necessary for the purposes described in this privacy notice, including the following categories of recipients:

- **Group companies** – where appropriate for internal administration, service delivery, reporting and business operations.
- **Service providers** – including providers of IT systems, cloud hosting, analytics, customer relationship management, communications, professional services and other support services, who process personal data on our behalf and in accordance with our instructions.
- **Professional advisers and auditors** – such as legal, financial, insurance and audit advisers, where this is necessary to obtain advice or meet our professional obligations.
- **Public authorities and regulators** – where we are required to do so by law, regulation or a valid legal request.
- **Third parties relevant to a corporate transaction** – such as a merger, acquisition, restructuring or sale of assets, where personal data is shared subject to appropriate safeguards.

## International transfers

HH Global operates globally and, in some circumstances, personal data may be transferred to, or accessed from, countries outside the United Kingdom or the European Economic Area (EEA). This may occur, for example, where this is necessary for service delivery, group operations, or the use of service providers.

Where we transfer personal data internationally, we ensure that appropriate safeguards are in place in accordance with applicable data protection laws. These safeguards may include:



- the use of standard contractual clauses approved by the UK Government and/or the European Commission, together with any required supplementary measures.

## 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.

## 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.

How long we retain personal data will depend on several factors, including:

- the nature of the data and the purpose for which it is processed;
- the nature and duration of our relationship with the relevant organisation;
- whether the data is required to comply with legal or regulatory obligations; and
- whether the data is required in connection with the establishment, exercise or defence of legal claims.

Where you are one of our customers, we will generally retain personal data for the duration of our relationship with the relevant organisation and for a period of up to six years thereafter, unless a longer retention period is required to comply with legal or regulatory obligations, or in connection with the establishment, exercise or defence of legal claims. In some circumstances we may anonymise 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



Depending on your location and the manner in which we process your personal data, 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 of your personal data .*
- *Request restriction of processing your personal data .*
- *Request transfer of your personal data .*
- *Right to withdraw consent.*
- *Right to Nominate.*
- *Right of Grievance Redressal.*
- *Right not to be subjected to Automated Decision Making.*

If you wish to exercise any of the rights set out above, please contact us at [Data.Protection@hhglobal.com](mailto:Data.Protection@hhglobal.com) or complete the following [webform](#)

If you have any questions or concerns about how we handle your personal data, please contact us at [Data.Protection@hhglobal.com](mailto:Data.Protection@hhglobal.com). We will do our best to address your concerns. Depending on your location, you may also have the right to contact your local data protection authority or regulator.

Please note that certain rights may be subject to limitations under applicable law.

## 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.

## Privacy Notice for U.S. Residents

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