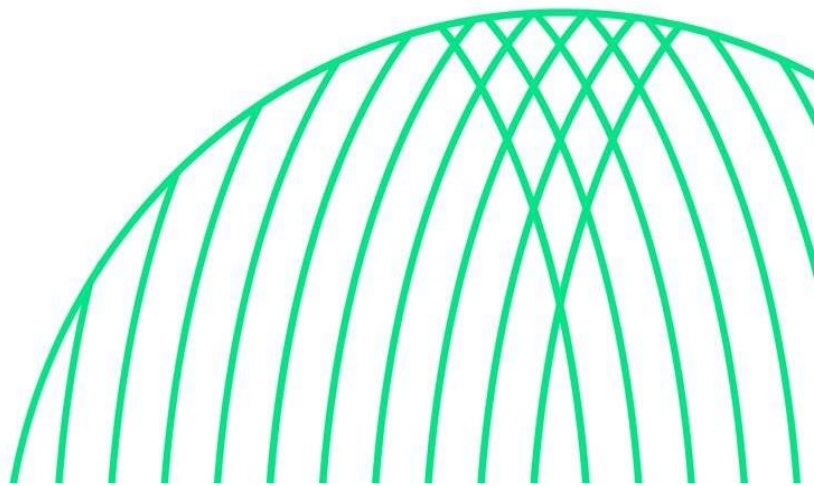


Privacy and Cookies Policy

Global

Last Updated: 6 August 2026



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, our platforms, portals and related digital services, including any data you may provide through these channels 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 and our platforms and portals are 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 are considered minors under the applicable data protection and privacy laws in their country or region.

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 the data protection department 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](#)

+44 208 770 7300

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 below. 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).

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 and our platforms and portals 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, platforms and portals, 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, authentication information, account settings, support requests, platform activity and usage information relating to this website and our 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 customer facing websites, platforms or portals 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, through our websites, platforms or portals or otherwise.

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

Automated technologies or interactions. As you interact with our website, platforms or portals, 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.

Where we need personal data to provide access to a customer-facing website, platform or portal, respond to your request, comply with a legal obligation, or perform a contract with you or the organisation you represent, and you do not provide that data when requested, we may not be able to provide the relevant access, service or response.

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 interest
To register you and the organisation you represent and manage our relationship with you as a customer or prospective customer.	Identity and contact Communications	(a) Performance of a contract (b) Necessary for our legitimate interests to maintain and develop customer/prospect relationships, respond to enquiries, manage communications and keep records of interactions and account administration.
To deliver services to customers and business partners, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Create, administer and manage user accounts, access permissions and support requests for customer-facing websites, platforms or portals (d) Provide, maintain and support access to customer-facing websites, platforms or portals	(a) Identity and contact (b) Transactional and financial (c) User and access (d) Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to deliver services efficiently and consistently; administer user accounts and manage access to customer-facing platforms; support business continuity and service quality; manage our financial function; and recover debts due to us where applicable. (c) Compliance with legal obligations, including accounting and tax requirements.
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	(a) Identity and contact (b) Business relationship (c) 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 study how customers use our products/services.
To operate, maintain and improve our websites, platforms, portals and related digital services, and to administer and protect our business, 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 to operate, maintain and improve our websites; understand how our websites are used and improve user experience; run our business; provide administration and IT services; ensure network security; and prevent fraud. (b) Consent where required under applicable e-privacy laws.

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	(a) Necessary for our legitimate interests to study how customers use our products/services, develop them, grow our business and inform our marketing strategy, subject to applicable marketing and e-privacy laws and the right to object. (b) Consent where required.
To use data analytics to improve our website, platforms, portals, 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, keep our website updated and relevant, develop our business and 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. (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 our sites and platforms. For all other types of cookies, we need your permission.

Our sites and platforms use different types of cookies. Some cookies may be 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 the relevant website or platform.

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, platform operation and support, authentication and access management, 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.

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International transfers

HH Global operates globally and, in some circumstances, personal data may be transferred to, stored in, or accessed from countries other than the country in which it was originally collected. This may occur, for example, where it is necessary for service delivery, group operations, collaboration between HH Global entities, or the use of trusted service providers.

- Where we transfer personal data internationally, we implement appropriate safeguards and transfer mechanisms as required by applicable data protection and privacy laws. These safeguards may include:
 - adequacy decisions or equivalent legal recognition frameworks;
 - standard contractual clauses or other approved contractual protections;
 - binding corporate rules, where applicable; and/or
 - other lawful transfer mechanisms and supplementary measures required under applicable law.
- We take reasonable steps to ensure that personal data transferred internationally remains protected and is processed in accordance with applicable data protection requirements.

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 a number of 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 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. 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.

