
NODUM GLOBAL LTD. WEBSITE PRIVACY POLICY

BACKGROUND

Nodum Global Ltd. (“Our Company”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.nodumglobal.com (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested on your initial visit to our website and again during points of contact, such as during submission of a contact form.

1. Information About Us

Our Site is owned and operated by Nodum Global Ltd., a limited company registered in England under company number 11510188.

Registered address: 8-10 Hill Street, Mayfair, London, W1J 5NG.

VAT number: 335814693.

Information Commissioner’s Office Registration Number: ZA485206.

2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to review the privacy policies of any such websites before providing any data to them.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.

- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

5. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table.

| Data Collected | How We Collect the Data |
|--|---|
| Identity Information including name, title, gender, marital status, or other personal data that is identifiable as you | If you voluntarily submit this data via our online ‘Contact Us’ form. |
| Contact information including email address, address, or phone number. | If you voluntarily submit this data via our online ‘Contact Us’ form. |
| Business information including business name, | If you voluntarily submit this data via our online |

| | |
|---|--|
| job title, profession, company number, or other identifiable business information voluntarily submitted by you. | 'Contact Us' form. |
| Technical information including IP address, browser type and version, operating system. | Upon accessing Our Site, through information provided by your web browser and/or device. |

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we use your personal data, and our lawful bases for doing so:

| What We Do | What Data We Use | Our Lawful Basis |
|-----------------------------|---|--|
| Administering Our Site. | Technical information including IP address, browser type and version, operating system.. | Our legitimate interest of maintaining performance of our website.. |
| Administering our business. | Identity Information including name, title, gender, marital status, or other personal data that is identifiable as you. Contact information including email address, address, or phone number. Business information including business name, job title, profession, company number, or other identifiable business information voluntarily submitted by you. | Our legitimate interest to provide you with the information and services you have requested. |
| Communicating with you. | Identity Information including name, title, gender, marital status, or other personal data that is identifiable as you. Contact information including email address, address, or phone number. Business information including business name, job title, profession, company number, or other identifiable business information voluntarily submitted by you.. | Our legitimate interest to provide you with the information and services you have requested. |

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in the light of the reason(s) for which it was first collected. We may retain a copy of your information for compliance reasons. When you update your information, we may retain a copy of the prior version for our records.

The following factors will be used to determine how long your personal data is kept:

- (a) The objectives and requirements of the Our Company;
- (b) The type of personal data in question;
- (c) The purpose(s) for which the data in question is collected, held, and processed;
- (d) Our Company's legal basis for collecting, holding, and processing that data; and
- (e) The category or categories of data subject to whom the data relates.

8. How and Where Do You Store or Transfer My Personal Data?

The information that we collect from you we may store, process and transmit in Europe, the United States and locations around the world - including outside your country. Information may also be stored locally on the devices you use to access the Services. Your personal data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff are engaged in, among other things, the provision of support services, maintaining and operating the Site, and providing security services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy. Each affiliate or supplier receiving your personal data is bound by standard contractual clauses that comply with the standard contractual clauses for the transfer of

personal data to controllers established in third countries set out in the European Commission Decision 2010/87/EU.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information and store all the personal information you provide to us on securely protected servers.

In addition, the transmission of information via the internet is not completely secure. Although we will make every reasonable effort to protect your personal data, we cannot guarantee the security of your personal data transmitted via Our Site and any transmission is at your own risk.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for legitimate business reasons.

10. Can I Withhold Information?

You may access Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All Subject Access Requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a Subject Access Request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: dpo@nodumglobal.com.

Postal Address: 8-10 Hill Street, Mayfair, London, W1J 5NG.

13. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Website Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 24th January 2021.