

Marketing Privacy Statement

Harold Stephens ("we," or "us") cares about your privacy and wants you to be familiar with how we collect, use, and disclose your information. This Privacy Statement covers the collection, use, and disclosure of personal data collected in relation to the marketing practices of Harold Stephens. This Marketing Privacy Statement (this "Privacy Statement") also describes your legal rights with respect to such information.

Data Collection

We collect or otherwise obtain information relating to you in a variety of ways. Such information may include personal data, i.e., information that alone or in combination with other information identifies or can be reasonably linked to you as an individual.

The information we may gather about you includes:

Information you provide. We may ask you to provide, or you may choose to provide, information such as (but not limited to) your name, email address, phone number, professional information (e.g., industry, company, and job title), demographic information, and geographic location. Such information may be provided to us at various times, including:

When you register for or attend Harold Stephens-hosted or sponsored events, such as webinars, conferences, and seminars;

When you request copies of Harold Stephens publications; and

When you request information about or receive products and services from Harold Stephens.

Information collected when you engage with Harold Stephens electronically/online. Harold Stephens may also collect information about you via:

Email or newsletter subscriptions: Harold Stephens's marketing emails to our business contacts may use pixel tags, web beacons, and/or HTML-formatted email messages that track and report back to Harold Stephens the actions recipients take in response to our emails (e.g., whether a message has been opened, read, or deleted).

Website or social media activity: Harold Stephens may, through various tools and technologies, collect information about you when you follow, post comments on, or otherwise interact with us on our website, Harold Stephens's social media channels, or Harold Stephens's advertising or marketing posts on other websites or platforms.

Please note that social media sites or webinar/video platforms hosted by a third party other than Harold Stephens may also collect information about you. You should review those third parties' privacy statements to understand how and when they will collect and use your data. A copy of Harold Stephens's website privacy statement may be found in the footer of our website.

Information We Do Not Seek. We generally do not seek information that may be considered "special" or "sensitive" personal data (e.g., information related to your racial or ethnic origin, political opinions, religious or other beliefs, health, criminal background, or trade union membership) for marketing purposes, and we ask that you do not provide such information.

Data use

To Fulfill Your Requests: As described above, Harold Stephens will use your information to respond to your communications or inquiries, to provide information or publications you request, to interact with you on social media, and to register you for Harold Stephens events.

Marketing of Harold Stephens Services: Harold Stephens may use your data to market our services to you, including to provide you with promotional materials or offers for products and services from Harold Stephens, or send you other communications about Harold Stephens's business and events.

Harold Stephens may send marketing-related communications to individuals who have requested them, or individuals in key roles at current or prospective clients who we believe may be interested in Harold Stephens's services. We may provide these communications and offers in various ways, including via email, postal mail and social media platforms.

In addition to the purposes above, we may also use your information:

for our internal business purposes, data analysis, to conduct research and analytics about your use and interaction with us, develop new products, improve existing products or services, identify trends, assess the performance of our advertisements and marketing, optimise our advertising and marketing campaigns, and determine the effectiveness of our communications; protect the rights, safety, property, or operations of Harold Stephens or our affiliates, you, or others; and comply with applicable law.

We will not use your personal data to advertise, promote, or market third-party goods or services to you. We do not sell any personal data received for the purpose of marketing communications to third parties for their own commercial use.

Basis for Processing Personal Data

The Data Protection Act (2018) requires us to set out in this Privacy Statement the legal basis upon which we rely in order to process personal data.

Consent: We may rely on the consent that you provide us at the point of collection of your personal data to use such information for the purposes outlined herein. For example, you may have agreed to receive marketing materials such as our electronic newsletters.

Legitimate interests: We may rely on our legitimate interests to process your personal data, provided that such interests are not overridden by your interests, fundamental rights, or freedoms. In particular, we may process your personal data in reliance on a legitimate interest in the effective and lawful operation of our businesses, maintenance of our client relationships, continued relevancy of client

and prospective communications, and the effective delivery of information and services to you. We may have other legitimate interests and, if so, we will make clear what those interests are at the relevant point in time.

Compliance with legal obligations: We may process your personal data if necessary for us to comply with a legal obligation arising under an applicable law to which we are subject.

If you have questions or concerns about the legal basis upon which we collect and use your personal data, you may contact us at marketing@haroldstephens.co.uk.

Disclosures of Data

In connection with one or more of the purposes outlined in the "Data Use" section above, we may disclose your information to:

third parties that provide services to us, such as, but not limited to, website or system hosting, management, and support; data back-up; data analysis; security and storage services; IT infrastructure services; customer service; and email delivery services;

competent governmental and public authorities, in each case to comply with legal or regulatory obligations or requests;

and other third parties as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to enforce our terms and conditions; (d) to protect our operations or those of any of our affiliates; (e) to protect our rights, privacy, safety, or property, and/or those of our affiliates, you, or others.

Third-party sites and platforms

As noted above, we may obtain information about you directly or indirectly via third-party websites, such as social networking sites; online publications; or through your registration for events. This Privacy Statement does not address, and we are not responsible for, the privacy practices of any third parties. Any websites or platforms (e.g., social media websites and apps) hosted by a third party other than Harold Stephens may also collect information about you, and the processing of your information by these third parties is governed by their privacy statements. Therefore, we encourage you to review the privacy statements offered by any websites or platforms you utilise.

Exercising your rights and choices

You have choices about how your personal data is handled, and we are committed to providing you with reasonable access to your personal data and the ability to review and limit the use of such information in accordance with applicable law.

If you do not wish to receive marketing emails from Harold Stephens, you can click on the "unsubscribe" link available in each such email message or update your email preferences by emailing marketing@haroldstephens.co.uk. Please note that if you opt-out of receiving marketing-related messages from us, we may still send

you important administrative messages as part of your ongoing use of our products and/or services.

Depending on your country of residence, you may also have the right to:

request confirmation that we are processing your personal data;

request a copy of the personal data we hold about you;

request that we update the personal data we hold about you or correct such information that is inaccurate or incomplete;

restrict the way in which we use your personal data (e.g., if we have no legal right to keep using it) or limit our use of your personal data (e.g., if your personal data is inaccurate or unlawfully held);

object to our processing of your personal data;

withdraw the consent that you have given us to process your personal data (where we process your personal data on the basis of your consent);

request that we delete the personal data we hold about you; and

lodge a complaint with the data protection or privacy authority in your country of residence regarding our processing of your personal data.

If you are interested in exercising one or more of the rights described above, you may submit a request using the form here or contact us at marketing@haroldstephens.co.uk. Please note that we may require proof of your identity before we can give effect to these rights.

We will not discriminate against you if you decide to exercise your rights under applicable law.

If you have any questions or concerns about our collection or use of your personal data, you can contact our Data Protection Officer at compliance@haroldstephens.co.uk.

If you are unsatisfied with the way in which we have handled your personal data or any privacy query or request that you have raised to us, you have a right to complain to the Information Commissioner's Office (ICO). Complaints can be submitted to the ICO through its helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available on the ICO website: <https://ico.org.uk/>

Data security and transfers of data

Harold Stephens maintains a global data security organisation that uses reasonable organisational, technical and administrative measures to protect your data while under our control. We may store and process your data in the UK and would not expect to be in a position where data would need to be transferred out of the UK. We would seek your permission before doing so for any reason.

Contact Us

If you have any comments or questions regarding this Privacy Statement or our data handling practices, or wish to contact our Compliance Officer, please contact us at compliance@haroldstephens.co.uk. You may also send us a letter at the following address: Harold Stephens, 50 High Street, Westbury on Trym, Bristol BS9 3DZ.