

# 1736 Summit Privacy Notice

## **OUR ETHOS**

Discretion is vital to our DNA and key to creating an environment conducive to the most beneficial advisory relationship. We respect and value your privacy and ours, protect your personal data, and are transparent about how we process your personal data.

For the purposes of U.K. data protection laws, the Data Controller is Pontem Strategies Ltd., company number 11331460, registered office Queensgate House, 23 North Park Road, Harrogate, North Yorkshire HG1 5PD.

## **This Privacy Notice tells you:**

1. What personal information we hold, and why we collect it
2. How we use the information
3. Who we share the information with
4. How long we keep your personal data
5. What we do with your personal data when we no longer need it
6. The security measures in place to protect your personal data

## **The type of personal information we collect**

We currently collect and process the following information:

- Name
- Postal Address
- Email address
- Contact telephone number(s)
- Employer / Employment status
- Job title
- Confidential notes from questionnaires, assessments, and meetings with you
- Family information

## **Your personal information and why we have it**

In giving your personal information to us, you are giving us your consent to store it and to use it in the ways set out in this document. Most of the personal information we process is provided to us directly by you, and we only collect and process the personal data that is needed for identified purposes.

## **Monitoring and review**

*This policy was last updated 11 August 2021 and shall be regularly monitored and reviewed, at least every two (2) years.*

When you interact with us (corresponding by post, phone, email, or direct message) you provide personal data to us by:

- a. Applying for our services
- b. Subscribing to newsletters or updates
- c. Requesting information
- d. Interacting with us via Social Media
- e. Participating in a survey, promotion or competition
- f. Capture of personal data on our website by the use of cookies
- g. Analytical data from search engines

### **How we use your information**

We will only use the information that you have given when Data Protection Regulations allows us. This occurs:

- a. To ensure we fulfil the contract we have with you.
- b. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- c. Where we are required to comply with a legal or regulatory obligation.

We do not rely on consent as a legal basis for processing your personal data (other than in relation to sending third party direct marketing communications to you via email or text message).

You have the right to withdraw consent to marketing at any time by contacting us at [privacy@pontem.group](mailto:privacy@pontem.group)

We may share personal data with third party companies where such companies are necessary for the fulfilment of obligations. Personal data shall not be transferred to a country or territory that is not recognised by the U.K. as having an adequate level of Data Security, unless it is made with the consent of the Data Subject, or is made to satisfy our legitimate interest in regard to our contractual arrangements with our clients.

Under the UK and EU General Data Protection Regulation (GDPR), the lawful bases we rely on for processing personal information are:

- Consent. You are able to withdraw your consent at any time. You can do this by contacting us at [privacy@pontem.group](mailto:privacy@pontem.group)
- Contractual obligation
- Legal obligation
- Vital interest
- Legitimate interest

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For more on the lawful basis, please see:

[www.ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing](http://www.ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing)

## **Data security**

### **How we store your personal information**

Your information is securely stored to prevent accidental loss and/or disclosure, unauthorised use, and/or access to your personal data. Any deemed appropriate third parties will only process your personal data on our instructions which are subject to your approval. We require any third parties we engage with to have a duty of confidentiality regarding personal data and to treat it in accordance with the law.

Clients will be notified in the event of any suspected or actual data breach. Procedures are in place to handle any such breach. Regulator(s) will be notified of any personal data breach as required by law. We keep personal information for as long as necessary on a client-by-client basis, in order for us to fulfil our contractual obligation with you and satisfy any legal, accounting or reporting requirements. The retention of personal data generally shall not be required for more than six years after the end of the professional engagement. Personal data may, on occasion, be used anonymously for research or marketing purposes without further notice to you.

We will not use personal data for any monitoring or profiling activity or process, and will not adopt any automated decision-making processes.

### **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

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**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights.

We will facilitate any request from a data subject who wishes to exercise their rights under data protection law, always communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

We will delete your personal information from our electronic/paper files and databases when you notify us that you want some or all of your data deleted unless a legal obligation prevents this from occurring.

**For more information:**

Contact us at [privacy@pontem.group](mailto:privacy@pontem.group) or reach us on +44 203 936 3411.

**How to complain**

If you have any questions or concerns about our use of your personal information, you can contact us at [privacy@pontem.group](mailto:privacy@pontem.group)

We will do our best to respond to your request. If you are unhappy with our response, please let us know so that we can satisfactorily address your concerns.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO general website: [www.ico.org.uk](http://www.ico.org.uk)

ICO complaints: [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint)

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