

# Privacy Policy

## Who We Are

**Cebile Capital LLP** ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

**Cebile Capital LLP's** registered office is at 4 Old Park Lane, London W1K 1QW and we are a company registered in England and Wales under company number OC359841. We are registered on the Information Commissioner's Office Register; registration number Z3054927, and act as the data controller when processing your data. Our designated Appointed Person is Lisa Holland, who can be contacted at 1st Floor, 9 Berkeley Street, London, W1J 8DW | [lisa@cebile.com](mailto:lisa@cebile.com) | +44 (0)20 366 0652.

## Information We Collect

**Cebile Capital LLP** processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

### The data we collect is:

- Name
- Position within the Business
- Business Address
- Business Email
- Telephone Number

### We collect information in the below ways:

- Through information collected in the public domain such as corporate websites
- Through direct interactions
- Through information requests completed on our website
- Through commercial databases or target research

## How We Use Your Personal Data

**Cebile Capital LLP** takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

### The purposes and reasons for processing your personal data are detailed below:

- We collect your personal data in the performance of a contract
- We collect your personal data when identifying key contacts within your business
- We will occasionally send you information where we have assessed that it is beneficial to you and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

## Your Rights

You have the right to access any personal information that **Cebile Capital LLP** processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with the data protection laws; as well as to object to any direct marketing from us and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

### Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

### Safeguarding Measures

**Cebile Capital LLP** takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including:

Encryptions, restricted access, IT authentication and anti-virus/malware.

### Transfers Outside the EU

**Cebile Capital LLP** utilise some products or services (or parts of them) that may be hosted/stored in the United States of America, which means that we may transfer any information outside the European Economic Area (“EEA”) for the below purposes: –

**Website hosting, email servers, cloud-based document storage, CRM.** Therefore, personal information may be stored on servers which are hosted in the United States of America. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by **Cebile Capital LLP** to protect your data and comply with the relevant data protection laws.

Where we transfer personal information for the above reasons, we utilise the below safeguarding measures and mechanisms to ensure that your personal data is always safe and secure:

- **Confirmed security standards and certifications, specifically ISO 27001, ISO 27017, ISO 27018.**

### Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Cebile Capital LLP, however, as this information is required for us to provide you with our services/legitimate interests, we will not be able to offer some/all our services without it.

### Legitimate Interests

As noted in the ‘How We Use Your Personal Data’ section of this notice, we occasionally process your personal information under the ‘legitimate interests’ legal basis. Where this is the case, we have carried out a thorough ‘Legitimate Interests’ Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the ‘legitimate interests’ legal basis for processing your business contact information and have identified as being beneficial to our contacts and in our interests. Such information will be relevant to you as a contact and will be non-intrusive.

### How Long We Keep Your Data

**Cebile Capital LLP** only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

### Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer’s hard drive. They help us to improve our site and enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

## Lodging A Complaint

**Cebile Capital LLP** only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

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**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**SK9 5AF**  
**0303 123 1113**