

## Privacy Policy

Last updated 22 August 2022

### 1. About this policy

The Beacon Group (trading as "Beacon") is committed to protecting and respecting your privacy. This policy describes how we collect, use and otherwise process personal data relating to you or that you provide to us:

- (i) when you visit or use:
  - our platform at [www.beacon.com](http://www.beacon.com) (the "**Platform**");
  - any of our computer or mobile software applications (the "**Apps**");
  - our social media pages; and
  - any of our services, including our supply chain visibility and/or supply chain finance platform (the "**Services**");
- (ii) when you contact us, including by email or telephone;
- (iii) through sales and marketing activities;
- (iv) when you apply for a job with us; and
- (v) when you otherwise engage with us for business purposes (for example, if you work for one of our suppliers).

Please read this policy carefully to understand our practices regarding personal information.

For the purposes of this policy, all references to the Platform shall include a reference to the Apps, and references to "Beacon", "we", "us" or "our" are to The Beacon Group (please see paragraph 11 entitled "contacting us" for further information).

For the purposes of data protection laws, the data controller is Beacon. In this Policy, the terms "personal data (or information)", "processing", "data controller" and "data processor" shall have the meaning ascribed to them in the UK General Data Protection Regulation.

### 2. What personal data do we collect?

#### 2.1. Information that we collect from you

The type of information we collect from you will depend upon the type of interaction you have with us.

The types of personal data that we collect may include:

- if you are a customer of Beacon: your first and last name, email address, postal address, telephone number, job title and information about our interactions with you and the transactions which you conduct using the Platform and/or the Services;
- if you are a supply chain finance customer: directors' and key individuals' names, addresses, dates of birth and identification documents (including passports) to carry out anti-money laundering, sanctions, credit and other relevant checks on such individuals;

- if you are a job applicant: your first and last name, email address, postal address, telephone number, identification details, job title, employment history and education details, names and contact details of referees, next of kin details, salary information, national insurance number and any other information as required by law;
- if you are a supplier or other business contact: your first and last name, email address, postal address, telephone number, job title and information about our interactions with you;
- personal data that you provide by completing forms on the Platform or Apps, including if you sign up to receive our newsletter, search for a product, place an order on the Platform, request any information, or enter into any competition or promotion;
- if you register or create an account with us, your log-in and password details;
- information contained in messages when you post on our social media pages;
- information contained in communications you send to us. For example when you report a problem or submit queries, concerns or comments regarding the Platform or our Services;
- data from rating and feedback systems and surveys that we may, from time to time, run for research purposes, if you choose to respond to, or participate in, them;
- information contained in telephone calls we record;
- information relating to you that is available on the Internet, such as from Facebook, LinkedIn, Twitter and Google, or other publicly available information that we acquire from our service providers; and
- information about your computer and your visits to the Platform, such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed, and other data collected through cookies and other tracking technologies.

If you choose to withhold requested information, you may not be able to access all of the Platform's content and features and we may not be able to provide our Services to you.

### **3. How do we use personal data and on what basis?**

We use personal data relating to you that we collect, or that you provide to us on the following bases:

**In order to perform our contract** as follows:

- to respond to your queries;
- to provide you with information, products or services that you request from us;

**For the purposes of our legitimate interests**, as follows:

- to provide you with information, products or services that we feel may interest you (including products or services of carefully-selected third parties) where you have

expressly consented to be contacted for such purposes (please see paragraph 9 entitled "Your rights" for further information);

- to check the creditworthiness of potential supply chain finance customers;
- to ensure that content from the Platform is presented optimally for you and for your computer;
- to notify you about changes to the Platform and our Services; and
- as part of our efforts to keep the Platform and our Services safe and secure;
- to manage recruitment activities and candidate assessment processes;
- to protect our business and to enforce our rights; and
- to keep records of facts relevant to our business and to train our staff through the use of recorded telephone calls.

**To comply with our legal obligations** as follows:

- to carry out checks and/or to submit reports to relevant agencies as required by the law;
- to comply with our anti money laundering and anti terrorist financing obligations;
- to take measures aimed at detecting and preventing fraud.

#### **4. How do we share personal data with third parties?**

We may disclose personal data relating to you to third parties in certain circumstances including (but not limited to) the following:

- our suppliers who supply services that you request via Beacon (such as shipping companies or carbon credit providers) or with whom you request we share your personal data;
- other third parties that we engage to help us run our business, such as payment processors and IT services suppliers (this includes other companies within our group who assist us to provide our Services to you);
- where you are a supply chain finance customer, our third party debt providers, including Beacon Financial Holdings Limited;
- analytics and search engine service providers that assist us in the improvement and optimisation of the Platform;
- our professional advisors, including lawyers, accountants, tax advisors and auditors;
- brokers or providers of insurance services, and providers of any recognised credit reference or credit assessment service;
- law enforcement bodies, agencies, courts of law or as otherwise required or authorised by law or regulation;

- any person to whom information is required to be disclosed in connection with any litigation, arbitration, administrative or other investigation or proceedings; and
- regulatory or government bodies for the purposes of resolving complaints or disputes, both internal and external, or to comply with any investigation by one of those bodies.

Where we provide supply chain finance, we may disclose personal data relating to you to the following:

- other parties involved in the financing arrangements, including any actual or potential assignee of the rights and/or obligations under the facility agreement and/or loan and any participant or sub-participant in relation to any transaction under which payments are to be made or may be made by reference to any facility agreement;
- third parties used to carry out our checks including know your client checks, credit checks, anti-money laundering checks, combatting the financing of terrorism checks and sanctions checks; and
- our open banking and open accounting partners whose services we use as part of the credit checking process;
- to investors and potential investors and any other person to facilitate any investment for the purposes of financing the facility and/or loan.

We may also disclose personal data to third parties:

- in the event that we sell any business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets and their advisors;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we restructure our business, or if we integrate our business with another group of companies, in which case personal data held by us will be disclosed to the new owner to be used in the same ways set out in this policy;
- if we seek investment, in which case personal data held by us may be disclosed to investors and potential investors and their advisors;
- if we are under a duty to disclose or share personal data relating to you in order to comply with any legal or regulatory obligation, or in order to enforce or apply our terms and conditions on which we supply services to you or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- for any other purposes that you would reasonably expect.

Before Beacon discloses any personal data to a third party, we take steps to ensure that the third party will protect personal data in accordance with applicable privacy laws and in a manner consistent with this policy. Third parties are required to restrict their use of this information to the purpose for which the information was provided.

## **5. External Links**

Although the Platform only looks to include quality, safe and relevant external links, users should always adopt a policy of caution before clicking any external web links mentioned throughout the Platform.

The Platform may, from time to time, contain links to and from the websites of our distributors, partners, partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **6. Social Media Platforms**

Communication, engagement and actions taken through external social media platforms that we participate on are subject to the terms and conditions, as well as the privacy policies, of those social media platforms.

## **7. Where do we store personal data?**

The personal data that we collect from you may be transferred to, and stored at, locations outside the United Kingdom ("UK"). It may also be processed by staff operating outside the UK who work for Beacon or for one of our suppliers or service providers.

Countries where personal data relating to you may be stored and/or processed, or where recipients of personal data relating to you may be located, may have data protection laws which differ from the data protection laws in your country of residence.

By submitting your personal data, you accept that personal data relating to you may be transferred, stored or processed in this way. We will take all appropriate steps to ensure that your data is treated securely and in accordance with this policy.

## **8. How do we protect personal data?**

The transmission of information via the Internet is not completely secure. Although we will do our best to protect personal data relating to you, we cannot guarantee the security of such data and any transmission is at your own risk. Once we have received personal data relating to you, we use strict procedures and security features to try to prevent unauthorised access.

All information you provide to Beacon is stored on secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using industry-standard encryption technologies when transferring or receiving personal data, such as SSL technology. The safety and security of your information and any personal data relating to you also depends on you. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Platform and/or the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Beacon takes steps to destroy or de-identify personal data information that is no longer required for any purpose for which it may be used or disclosed by us and that we are no longer required by law to retain.

## **9. Your rights**

You have the right to access personal data held relating to you. To protect your privacy, we may take steps to verify your identity before taking any action in response to any request. You will not have to pay a fee to access personal information relating to you (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We also want to make sure that personal data relating to you that we hold is accurate and up to date. You may ask us to correct or remove any information you think is inaccurate.

You may also have the right, in certain circumstances, to:

- the erasure of personal data relating to you that we hold;
- the restriction of processing of personal data relating to you that we hold;
- object to our processing of personal data relating to you that we hold; and
- the portability of personal data relating to you that we hold.

Requests in this section should be sent by email or by writing to us using the contact details set out at the end of this policy.

We will only send you marketing material if you consent. When you have consented to marketing material, you have the right at any time to ask us not to process personal data relating to you for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the marketing emails we send you. You can also exercise the right at any time by sending an email or by writing to us using the contact details set out at the end of this policy.

If you have a concern about the way we are collecting or using your personal information, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

## **10. Cookies**

We collect personal data and other information automatically when you use the Platform and when you navigate the Platform. This includes:

1. During the search process, we will send data via cookies in the token, that will include the following information: First Name, Last Name, Company Name, Email Address and Phone Number.
2. During your use of the Platform we will also send data via cookies related to our internal company data related to your account, that will include: User ID, Company ID, Role ID, Currency and Currency Exchange Rate.
3. During your use of the Platform we will also use cookies from the Google Analytics platform in order to gather statistics on the volume of visits on each of the sections of the Platform.

You can manage/delete cookies as you wish - for details, see [aboutcookies.org](http://aboutcookies.org).

### **Removing cookies from your device**

You can delete all cookies that are already on your device by clearing the browsing history of your browser. This will remove all cookies from all websites you have visited.

Be aware though that you may also lose some saved information (e.g. saved login details, site preferences).

### **Managing site specific cookies**

For more detailed control over site-specific cookies, check the privacy and cookie settings in your preferred browser.

### **Blocking cookies**

You can set most modern browsers to prevent any cookies being placed on your device. However, you may then have to manually adjust some preferences every time you visit a site/page and certain services and functionalities may not work at all (e.g. profile logging-in).

## **11. Changes to this policy**

Beacon reviews and amends its privacy policy from time to time. Any changes we make to this policy in the future will be posted on this page and, where material, notified to you by e-mail. Please check this page occasionally to review any updates or changes to this Policy. This helps you remain informed of what information we collect, how we use it and under what circumstances, if any, it is disclosed.

## **12. Contacting Us**

This policy applies to The Beacon Group which includes Beacon Technologies Limited (incorporated in England with company number 11664346) and Beacon Capital Solutions Limited (incorporated in England with company number 13384299) and any other companies within The Beacon Group from time to time.

If there are any questions regarding this privacy policy, you may contact us using the information below.

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London  
W1J 5AW.

Email: [support@beacon.co.uk](mailto:support@beacon.co.uk)