

S-RM Privacy Policy

1. Introduction and scope

S-RM is committed to protecting and respecting your privacy. We comply with the applicable data privacy and security requirements in the countries in which we operate.

S-RM Intelligence and Risk Consulting Limited (company number 05408866) whose registered office is at 4th Floor, Beaufort House, 15 St. Botolph's Street, London, EC3A 7DT is responsible for this website. The S-RM group is made up of different legal entities globally, details of which can be [found here](#).

This Privacy Policy is issued on behalf of the S-RM group so when we mention S-RM, "we", "us" or "our" in this Privacy Policy we are referring to the relevant company in the S-RM group responsible for processing your data.

This Privacy Policy sets out the basis on which we process the following types of data relating to identified or identifiable individuals ("**Personal Data**"):

- Any Personal Data provided to us in connection with our contractual relationship with a client or prospective client ("**Client Data**");
- Any Personal Data provided to us through our website ("**Website Data**"); and
- Any Personal Data that is provided to us or which we collect during the course of providing services to clients ("**Client Services Data**").

Where we process Website Data and Client Data, S-RM, or the relevant group company, is the controller. Where we process Client Services Data, S-RM may act as a controller or a processor depending on the service (as explained in more detail below). This Policy does not address the processing of Client Services Data that we carry out as a processor. If you contact us in respect of processing activities where we act as a processor, we will direct you to the client who has the responsibility for your Personal Data as a controller.

For information about our processing of Personal Data relating to S-RM staff, including prospective and current employees and independent contractors, please contact privacy@s-rminform.com.

2. What Personal Data do we collect and how do we use it?

We collect the following types of Personal Data as part of our business operations:

Client Data

We collect the following Personal Data from clients and prospective clients to enable us, and our group companies, to provide the requested services:

- Your full name and your job title; and
- Your contact details, including your e-mail address, phone number and, where applicable, the name of your company.

We may also collect and process the following additional Personal Data about you:

- If you contact us, we may keep a record of that correspondence;
- Details of your interests and preferences;

- Where you use our proprietary portal ("**Portal**"), you may be required to set up an account following which we will also process your account information (username and password); and
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access (see section on **Website Data** below).

Where you are an individual client and we provide you with our services, the collection of your Personal Data is a requirement for the performance of a contract between you and us, namely to enable us to provide to you the services you have requested. Where we provide our services to our corporate or institutional clients, we process your Personal Data for our legitimate interests to provide our client with the requested services. You are not under an obligation to provide us with any of your Personal Data. However, this might result in us being unable to provide the requested services.

We may also use your Personal Data for the following purposes and lawful bases:

- to market our services to you in which case our basis of processing is our legitimate interest in marketing our services to you, or where legally required, consent;
- to comply with applicable law or regulation;
- for internal research, training, analytics and statistical purposes in which case our basis of processing is our legitimate interests in maintaining and improving our products and services;
- for record-keeping purposes, in which case our basis of processing is to comply with applicable law or regulation or for the establishment, exercise or defence of legal claims.

In some circumstances, such as where we are legally required, we may seek your consent to process your Personal Data in which case we will ensure that our request for such consent is clear and transparent.

Website Data

S-RM collects Personal Data about users of its website such as e-mail addresses, phone numbers, company names (where applicable), job titles and any other additional information that users may choose to provide when submitting a request via our website. We may also collect information about your computer, including (where available) its 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 and it is used for the purpose of providing you with full access to the services available on our website. We also collect Personal Data by way of Cookies (as further detailed in our [Cookie Policy](#)).

We use Website Data in the following ways where it is necessary for our legitimate interests:

- to ensure that content from our website is presented in the most effective manner for you and for your computer;
- to analyse the data for the purposes of improving our website and services;
- to prevent fraud and/or for security; and
- to respond to a request submitted via our website.

Where applicable, we use Website Data to perform our obligations arising from any contracts entered into between you and us. We may also seek your consent for certain uses of your Personal

Data from our website, e.g. to register you for any requested subscriptions to newsletters and other communications.

We do not sell or disseminate Website Data to third parties or provide host mailing on behalf of third parties. We do enter Website Data into our contacts database, and we maintain it there, unless you ask us to remove it. You may ask us to remove your Personal Data from our database at any time by emailing us at marketing@s-rminform.com.

Client Services Data

S-RM provides cyber security, corporate intelligence (including strategic intelligence, regulatory and compliance due diligence, disputes and investigations and litigation support services) and crisis response services to clients (including both corporate and institutional clients and individual clients). As part of providing these services, our clients may require us to collect information on individuals. Personal Data may be provided to us by our client or by you or collected from public records such as corporate registries, court filings, and government and statutory body records, research sources such as media reports, news aggregators, specialist databases, social media and deep-web research, as well as from enquiries with human sources. Depending on the nature of the client engagement and the source of the Personal Data and the extent of control and decision making we have in respect of the Personal Data, S-RM may act as a controller or as a processor on behalf of its client. Please see S-RM [Data Protection Roles](#) for more information on when S-RM acts as a controller and a processor.

Client Services Data may include:

- Company and business professional contact information, including name, job title, address, phone number, fax number, e-mail address, passport, driving licence and other forms of identification, domain names, and trade associations;
- Detailed company profiles and statistics, which include details of company officers and employees and, for publicly listed companies only, the remuneration of certain officers;
- Background information regarding company management such as beneficial ownership/persons of significant control, the educational and career histories of company principals;
- Information relating to actual or suspected criminal offences data relating to company officers and employees from media reports or other information in the public domain;
- Background information regarding insert details, for example, professional information such as educational and career histories that is publicly available from social media accounts; and
- Special Categories of Personal Data, such as information relating to health, beliefs and political affiliations from media reports or other information in the public domain.

How we use Client Services Data

We use Client Services Data for the following purposes and in reliance on the following lawful bases:

- to provide services to our clients. Where acting as a controller, our basis of processing is our legitimate interests of providing services to our clients, including to assist them in fulfilling their legal, regulatory or compliance obligations or gain insights into businesses, industries and markets. To the extent the Client Services Data contains Personal Data relating to criminal convictions and offences or special categories of Personal Data, then depending on the nature of the client engagement, the processing of such Personal Data may be to protect the vital interests of an individual where the individual is physically or legally incapable of

giving consent, the processing relates to Personal Data which are manifestly made public by the data subject, or for reasons of substantial public interest;

- to comply with applicable law or regulation;
- for internal research, training, analytics and statistical purposes, in which case our basis of processing is our legitimate interests in maintaining and improving our products and services;
- for record-keeping purposes, in which case our basis of processing is to comply with applicable law or regulation or for the establishment, exercise or defence of legal claims.

In some circumstances, such as where we are legally required, we may seek your consent to process your Personal Data, in which case we will ensure that our request for such consent is clear and transparent.

4. Where we store your Personal Data

4.1 Storage and Retention

Except as otherwise permitted or required by applicable law or regulation, S-RM will only retain your Personal Data for as long as necessary for the purpose for which it is collected, as required to satisfy any applicable legal or regulatory obligations, or for the establishment, exercise or defence of legal claims.

If you request that we delete your Personal Data, we will respond to the request in accordance with applicable data protection laws. For requests for access, corrections, or deletion, and other rights, please refer to the **“Your Rights”** section of this Privacy Policy.

4.2 Transfers out of the UK and EEA

S-RM typically stores Personal Data on servers hosted in the UK and the European Union. We may transfer your Personal Data to our group companies and third-party suppliers and service providers, as well as our clients, both in and outside the UK and the European Economic Area (**“EEA”**) including to the US. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with the applicable data protection requirements and that the transfers of Personal Data are subject to appropriate safeguards including, where applicable, reliance on an adequacy decision by the UK or European Commission, or, in the case of absence thereof, the use of applicable contractual safeguards such as Standard Contractual Clauses approved by the European Commission or the Information Commissioner’s Office.

5. How we protect your data

S-RM has in place industry standard technical and organisational security measures in order to keep your Personal Data safe and to prevent against unauthorised access, use or disclosure.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling Personal Data.

6. Disclosures of Personal Data

We may disclose your Personal Data to any of our group companies (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006) and to our suppliers and service providers to assist us in the provision of the services requested by our clients and for the purposes outlined in this Privacy Policy. We may also disclose your Personal Data to the client who has engaged us to provide the service that the Personal Data

was collected for. Any such disclosures will be in accordance with the applicable data protection requirements using relevant safeguards and on a confidential basis where legally required.

We may also disclose your Personal Data to third parties:

- In the event that we sell or buy a business or assets, in which case we may disclose your Personal Data to the prospective seller or buyer of such business or assets;
- If S-RM or substantially all of its assets are acquired by a third party, in which case Personal Data held by it will be one of the transferred assets;
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of S-RM, our customers, or others. This includes but is not limited to providing information to our accountants, auditors and legal advisors and exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. Your Rights

7.1 Opt-Out

You have the right to ask us not to process your Personal Data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at marketing@s-rminform.com.

7.2 Data Subject Rights

In addition to the right set out above, applicable data protection laws provide individuals the following rights:

- The right to request access to the Personal Data we hold about you;
- The right to request correction or deletion of your Personal Data;
- The right to withdraw your consent for a specific use of your Personal Data provided to us;
- The right to request restriction of processing by us of your Personal Data;
- The right to object to processing of your Personal Data by us;
- The right to obtain copies of the data that we hold about you in a machine-readable format and to transfer such data to another company on your request.

However, please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the Personal Data or not disclose it, or other times when the rights may not apply at all.

If you wish to exercise any of these rights, please contact us at privacy@s-rminform.com. If we receive a request directly from a data subject where we act as a processor of the Personal Data on behalf of a client, we will contact the controller client for instructions on how to deal with the request. In certain cases, we may, with the consent of the client and without prejudice to our position as processor, elect to deal with the request on behalf of the controller client to ensure that the request is dealt with expeditiously.

8. Complaints Process

If you consider that our processing of your Personal Data breaches any of your rights under applicable data protection laws or you are otherwise dissatisfied with the way your Personal Data is handled by us, you have the right to complain to the applicable supervisory authority, including the UK Information Commissioner's Office, <https://ico.org.uk/>. A full list of supervisory authorities in the EEA can be found at www.edpb.europa.eu/about-edpb/about-edpb/members_en.

9. Data Protection Officer

Our Data Protection Officer is:

Danielle Mumford

4th Floor, Beaufort House

15 St. Botolph's Street

London

EC3A 7DT

privacy@s-rminform.com

10. Links to Third Party Websites

Our website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that S-RM does not accept any liability for any Personal Data you provide to those websites or your use thereof. Please check these policies before you submit any Personal Data to these websites.

11. Contact

Any questions you have in relation to this policy and how we use your data should be sent to privacy@s-rminform.com.

12. Changes to this Notice

We reserve the right to make changes to this Policy. Any updated Policy will be posted on our Website.

Last updated: November 2024