

PRIVACY NOTICE

Last Updated: 29th December 2022
Previous Version: [31st October 2022](#)

- Read our [EU-US Privacy Shield Policy](#)
- Read our [Australian Privacy Policy](#)
- Read our [Survey Data Collection Privacy Policies](#)

1. PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice (“**Privacy Notice**”) sets out how Hall & Partners processes your personal data in connection with our business, including the provision of our website at <https://www.hallandpartners.com> (“**Site**”) and the services we offer (“**Services**”).

In particular, this Privacy Notice explains our approach to any personal data that we might collect from you (i) when you use our Site or Services (ii) during any other interactions with us, or (iii) which we might otherwise process when providing Services to our clients (including the personal data we collect, why we collected it and your rights in respect of our processing of your personal data).

This Privacy Notice is intended to assist you in making informed decisions when using the Site and our Services. Please take a moment to read and understand this Privacy Notice. It is intended to be read in conjunction with our [Terms of Service](#) and [Cookie Notice](#).

Finally, this Privacy Notice is intended to meet the requirements of the Regulation (EU) 2016/79 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (known as “GDPR”), as well as the “UK GDPR” (as defined in the UK Data Protection Act 2018). When we say GDPR, we mean both the EU and UK versions.

2. SCOPE OF THIS PRIVACY NOTICE

This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links on our Site to third party websites over which we have no control).

Further, this Privacy Notice is not intended to cover the processing of workplace personal data. Accordingly, if you are engaged as a worker for us, please see our Workplace Privacy Notice which sets out further information about how we may process your personal data in connection with your employment and/or engagement.

3. CHANGES TO THIS POLICY

We will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements.

We may notify you by email of any significant changes to this Privacy Notice, but we encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data.

If we update this Privacy Notice, we will update the effective date at the top of the page.



4. ABOUT US

The Site and Services are made available by **Hall & Partners Europe Ltd** (“Hall & Partners”, “we”, “us”, “our”). Hall & Partners is the data controller responsible for your personal data.

Hall & Partners Europe Ltd is an English company (No: 02733595) with its registered office at **Bankside 3, 90 – 100 Southwark Street, London. SE1 0SW**.

Hall & Partners USA LLC, a company incorporated in Delaware, United States under Department of State DOS ID: **3214713** whose registered office is at 195 Broadway, 18th Floor, NY 10007, USA.

For the purpose of Article 27 EU GDPR, our EU representative is Diversified Agency Services B.V, a company incorporated in the Netherlands, with offices located at **Generaal Vetterstraat 82 (1059 BW) Amsterdam, Netherlands**.

For the purpose of this Privacy Notice and the GDPR, unless we state otherwise we shall be considered a data controller of your personal data in connection with use cases identified in this Privacy Notice. Please note that in many cases where we process data in relation to Services that we provide, we may carry out the activities referred to in this Privacy Notice in our capacity as a data processor acting on behalf of our clients. We have made this distinction clear in the Privacy Notice.

5. HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise your rights as a data subject set out in this Privacy Notice, you can contact us using the following methods:

Email	Send us an email at: privacy@hallandpartners.com
Internet	Fill out our Web Form
Post	Write to us at: Bankside 2, 100 Southwark Street, London. SE1 0SW.
Telephone	Call us on: +44 (0) 208 618 2500

6. TYPE OF PERSONAL DATA WE COLLECT/PROCESS

When we talk about personal data we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance. Categories of personal data we may collect and process about you include:

Identity Data	First name; last name.
Contact Data	Delivery address; billing address; email address; telephone number; social media handle.
Applicant Data	Date of birth; gender; country; nationality; CVs, work experience; dietary requirements any other personal data that you may provide in advance of/during your supply of services to us.
Image Data	Photos; video recordings.
Financial Data	Bank account details; partial payment card details.
Transaction Data	Details about payments made between you and us; details of services purchased from us.
Profile Data	Interests and preferences; contact preferences; whether you have participated in any promotions or competitions; feedback and survey responses; the content of any messaging you send using any Enquiry Form or Chat function on the Site.



Behavioural Data	Data relating to your browsing activity, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about any services you viewed or purchased through the Site.
Technical Data	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.
Marketing and Communications Data	Marketing preferences; service communication preferences.
Publicly Available Data	Information about articles (or similar) that you may have published; Information about your interests or affiliations or publicly stated positions on political matter, corporate matters and similar.

For more information about the personal data we collect please refer to section 'HOW WE USE PERSONAL DATA' below.

7. HOW WE COLLECT PERSONAL DATA

We may collect and receive your personal data using different methods:

Personal data you provide to us	You may give us your personal data directly, for example, when you obtain services via our Site, contact us with enquiries, complete forms on our Site, subscribe to receive our marketing communications or provide feedback to us.
Personal data we collect using cookies and other similar technologies	When you access and use our Site, we will collect certain Behavioural Data and Technical Data. We collect this personal data by using cookies and other similar technologies (see the " website insight and analysis " section below).
Personal data received from third parties	We may receive personal data about you from third parties. Such third parties may include analytics providers, data brokers, third party directories and third parties that provide technical services to us so that we can provide our Site and our Services.
Publicly available personal data	From time to time, we may collect personal data about you (Identity Data, Contact Data, or Publicly Available Data) that is contained in publicly available sources (including open source data sets or media reports) or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms).

8. WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

Site visitors	We will collect and process your personal data in connection with your interaction with us and our Site.
People who contact us with enquiries	If you contact us with an enquiry through our Site, submit a complaint or provide any feedback to us in our surveys and feedback forms, we will collect and process your personal data in connection with your interaction with us and our Site.
Client personnel	We may collect and process your personal data in connection with the supply of services to you and/or your organisation.



Talent	If you supply services and/or content to us and/or work with us to provide services to our client (including featuring in content we produce), we may collect or process your personal data, such as your Identity Data, Contact Data, Financial Data, CVs in connection with such supply of services and/or content to us and our clients.
Partner/supplier personnel	If you (or your organisation) supply products or services to us or otherwise partner with us, we may collect and process your personal data in connection with our receipt of those products and services and/or partnership. This may include personal data included in any email or telephone communications or recorded on any document relating to an order for the products or services, such as your Contact Data.
Visitors to our offices, studios, production sites	If you attend one of our physical offices or other locations, we may process personal data that you volunteer in connection with your visit and any enquiries you make. For example, you may volunteer personal data when signing in as a guest, or when you register for and access our guest Wi-Fi network at our premises. CCTV footage may also be collected for security purposes.
Event attendees	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you to complete a registration or feedback form, or other documents relating to the event.
Job applicants	If you apply for a job with us, whether through the Site or otherwise, we will collect and process your personal data in connection with your application.
Members of the public	We may process your data in connection with the provision of the Services to our clients.

9. HOW WE USE PERSONAL DATA

A: OPERATION OF SITE, PROVISION OF SERVICES AND MARKETING

I. Operation of the Site

If you browse our Site

When you browse our Site, we collect and process Behavioural Data and Technical Data to help us understand how you are using and navigating our Site. We do this so that we can better understand which parts of our Site are more or less popular and improve the structure and navigation of our Site.

Our legal basis for processing

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Services, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Site in a secure and effective way and so that we can make improvements to our Site.

Website insight and analysis

We and our third-party partners use cookies, web beacons, pixel tags and other similar technologies (which we generically refer to as “**Cookies**”) to collect data from the devices that you use to access our Site. The



data that is collected includes Behavioural Data and Technical Data, and certain Profile Data. Please see our [Cookie Notice](#) for further information, including details of our third-party partners.

We and our third-party partners use this data to analyse how you use our Site and our Services and the effectiveness of our Site and Services, including:

- to analyse how you use, and the effectiveness of, our Site and Services;
- to count users who have visited our Site and collect other types of information, including insights about visitor browsing habits, which helps us to improve our Site and Services;
- to measure the effectiveness of our content;
- to learn what parts of our Site are most attractive to our users, which parts of our Site are the most interesting and what kind of features and functionalities our visitors like to see;
- to help us understand the type of marketing content that is most likely to appeal to our visitors and customers.

Our legal basis for processing

Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our [Cookie Notice](#) for further details.

In certain circumstances, we may rely on another lawful basis when we use your personal data collected via the use of cookies. For example, where we use personal data collected through the use of analytics cookies to analyze how you use our Site, it is in our legitimate interest to use your personal data in such a way to improve our Site and Services.

II. Provision of our Services

Client data insight and analysis

We may, acting on our own behalf and on behalf of our clients, collect data about you in connection with the provision of our Services to carry out insight and analysis on an anonymised and/or aggregate basis so that we can improve our services and help our client to better understand their own customers' interests and improve their products/ services. The data that is collected includes Behavioural Data and Technical Data, and certain Profile Data.

Our legal basis for processing

To the extent the above involves personal data, it is in our legitimate interests (or those of our client) to process personal data in this way to enable us to provide our services. Where we do this on behalf of our clients as a data processor, we do not require a legal basis for such processing.

Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our [Cookie Notice](#) for further details.

Please note that often such services will relate to anonymous data sets (aggregated data sets, statistical data sets and similar) and are used for high-level market analytics or understanding macro consumer habits (amongst other things). When we do this, we and our clients are not processing personal data.

Market research and focus groups

As part of our service to our clients, we may collect an individual's data including Identity Data, Contact Data, Registration Data, Preference Data records of communications, health data, opinion data, age range, nationality, image, and education history for the purposes of carrying out market research through focus groups, interviews and user testing. We may do this on behalf of our clients or for our own purpose.



Our legal basis for processing

It is in our legitimate interests (and those of our clients) to process personal data in this way to ensure that we provide the services requested by our clients in an effective and efficient way.

Where we process special category data that was collected from an individual directly in connection with this purpose, we will only do so with the individual's explicit consent. Where we obtain this information from publicly available sources, we will rely on the fact that the individual made such information manifestly public.

Please note where we do this on behalf of our clients as a data processor we do not require a legal basis for such processing.

III. Marketing and Media Enquires

Marketing

We may use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organisation you represent) marketing communications by email or via phone. Our marketing will include press releases and information about us.

Our legal basis for processing

It is in our legitimate interest to use your personal data in this way to ensure the promotion of our services is tailored and/or appealing to you and/or the organisation you work for. Please note that we will only send you marketing with your consent.

B: BUSINESS ADMINISTRATION, FINANCIAL AND LEGAL

Receipt of services

If we have engaged an organisation to provide us or our client with services (for example, IT support or financial advice), we will collect and process your personal data (including Contact and Identity Data) if you are a contact within the relevant organisation in order to manage our relationship or our clients with the organisation, to receive services from the organisation and, where relevant, to provide our services to others including our clients.

Our legal basis for processing

It is necessary for us to use personal data in this way to perform our obligations in accordance with any contract that we may have with the organisation, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with the organisation and are able to provide our services to others in an effective way. Where we do this on behalf of our clients as a data processor, we do not require a legal basis for such processing.

Recruitment

If individuals apply for a job with us or otherwise express an interest in working for us, we will collect contact details and CV or resume information from the individual. We use such personal data for the following purposes: a) to assess the individual's suitability for any position for which they applied (or future positions for which we think the individual may be suitable) including employment or freelancer positions, summer placements or internships and also any business support or services role whether such application has been received by us online, via email or by hard copy or in person application; b) to take any steps necessary to enter into any contract of employment (or otherwise) with the individual; c) to comply with any regulatory or



legal obligations in relation to any such application; and d) to review our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation.

[For further information about this please see our [RECRUITMENT PRIVACY NOTICE](#) available on our Site.

What is our legal basis?

Where we use personal data in connection with recruitment and talent management it will be in connection with us entering into a legal contract with them or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment and talent management decisions for Hall & Partners], or it is our legal obligation to use such personal data to comply with any legal obligations imposed upon us. We will not process any special data except where we are able to do so under applicable legislation or with the individual's explicit consent.

Visiting our premises

If an individual visits any of our premises, we may collect personal data including Identity or Contact Data as part of our sign in process. We may also capture their image on our surveillance camera or CCTV. [We may also collect data relating to Covid-19 vaccination or testing in accordance with government regulation or guidance].

If an individual registers as a guest user for free Wi-Fi access at any of our premises, we may collect personal data including Identity and Contact Data as part of the registration process.

Our legal basis for processing

It is in our legitimate interests to process personal data in this way for security reasons [and we collect data relating to Covid-19 in order to comply with our legal obligations in relation to health and safety, or other legal obligations introduced in relation to the Covid-19 pandemic].

Where we process personal data in connection with providing access to our free Wi-Fi service, it is in our legitimate interests to process personal data in this way to provide the service. Where we monitor use of our free Wi-Fi service to ensure proper use of the system, we process personal data for monitoring and record-keeping purposes based on guest user consent.

Business administration, finance, and legal compliance.

We may use an individual's personal data (including Identity Data, Contact Data, Financial Data, Transaction Data, Publicly Available Data) for the following business administration and legal compliance purposes:

- to facilitate the operation or effective management of our group of businesses;
- for financial, accounting and tax purposes;
- to comply with our legal obligations;
- to enforce or protect our legal rights;
- to deal with complaints;
- to protect the rights of third parties (including where health or security of an individual is endangered (e.g. a fire); and
- in connection with a business transition or sale such as a merger, re-organisation, acquisition by another company, or sale of all or a portion of our assets.

Our legal basis for processing

Where we use personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this



section, we will rely on our obligation to comply with law (including any court order) to process such personal data.

We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with the individual's explicit consent.

10. IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you.

This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us or to process an application for employment with us.

this case, we may have to cancel your application or the provision of the relevant Services to you, in which case we will notify you.

11. SHARING YOUR PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

We are part of the Omnicom Group of marketing and PR firms and (subject to the above) may share data within Omnicom Group companies, Omnicom Networks, or with our partner agencies. For more information about the Omnicom Group, please see here: [Advertising and Marketing Agencies | Omnicom Group](#)

Further (again subject to the above) we may share your personal data with third parties, as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

Our clients	We may share personal data with our clients for the purposes of providing them with Services.
Our specialist suppliers/partners	We use various specialist suppliers and/or partners in order to provide our services. These providers are described in our Third Party Sub-Processor List
Third-party IT suppliers	We may share personal data with third parties who support us in providing our Site and help provide, run, and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, security, and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. We may also share your personal data with third-party service providers to assist us with insight analytics. These providers are described in our Cookie Notice
Payment providers and banks	We may share personal data with third parties who assist us with our invoicing and/or making/receiving payments.



Third-party post/email marketing and CRM specialists	We may share personal data with specialist suppliers who assist us in managing our marketing database and sending out email marketing communications.
Recruitment agencies and related organisations	We may share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies for recruitment purposes.
Auditors, lawyers, accountants and other professional advisers	We may share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.
Law enforcement or other government and regulatory agencies and bodies	We may share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.
Other third parties	Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

12. ACCESS

We provide you with reasonable access to the personal information maintained about you. We also provide you with a reasonable opportunity to correct, amend or delete the information where it is inaccurate. We may limit or deny access to personal information where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of third persons would be violated.

13. CHOICE AND MEANS

We generally offer you the opportunity to choose whether your personal information may be (a) disclosed to third-party controllers or (b) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by you. Unless we offer you an appropriate choice, we use personal information only for purposes that are materially the same as those indicated in this Policy. To exercise your choices you may contact us as indicated in this Policy.

14. DATA TRANSFERS OUTSIDE THE UK AND THE EEA

We may transmit personal data outside the UK and the EEA to certain categories of third parties (as listed above in **SHARING YOUR PERSONAL DATA** and more specifically to: (1) our headquarters in United Kingdom (“**US**”); (2) our different offices in the United States of America and other locations globally; (3) Omnicom Group entities, networks or partners agencies in the United States of America or in other locations globally.

Non-EEA countries do not have the same data protection laws as the UK and the EEA. In particular, non-EEA countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data.

However, when transferring your personal data outside the UK or the EEA, we will ensure that, where required by applicable law, at least one of the following safeguards is implemented: (1) we will only transfer



your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government or the European Commission; or (2) where we use certain service providers, we may use specific contracts approved by the UK Government or the European Commission referred to as the “Standard Contractual Clauses” or “SCCs” which give personal data the same protection it has in the UK and EU.

To find out more about the SCCs we use, please see: [Standard contractual clauses for international transfers | European Commission \(europa.eu\)](#) or please email us at privacy@hallandpartners.com

15. OBTAINING YOUR CONSENT

Where our use of your personal data requires your consent, you can provide such consent:

- at the time that we collect your personal data following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Notice.

Please note that if you specifically consent to additional uses of your personal data, we may use your personal data in a manner consistent with that consent.

16. CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Site and those who purchase our Services.

17. YOUR DATA PROTECTION RIGHTS

You have the following rights in relation to the personal data we hold about you under certain circumstances:

- To obtain the confirmation that we process personal data about you, to access and obtain copies of the information, as well as information relating to the processing we carry out.
- To request your personal data be corrected where appropriate.
 - If personal data we hold about you is inaccurate or incomplete, you may request that data be amended. However, please be aware that it is every person’s responsibility to provide us with accurate personal data and to inform us of any changes (e.g. new home address or change of name).
- To request your personal data be deleted, where appropriate.
 - If you demonstrate that the purpose for which the personal data is being processed is no longer legal or appropriate, the data will be deleted, unless we can demonstrate that we are required to retain the personal data by applicable law or otherwise.
 - If we have shared your personal data with others, we will let them know about the deletion where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.
- To request that we restrict the processing of your personal data in some circumstances, such as where you contest the accuracy of the personal data, while we investigate your concern.
 - It will not prevent us from storing your personal information.
 - We will tell you before we lift any restriction.



- If we have shared your personal information with others, we will let them know about the restriction where it is possible for us to do so.
- If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly
- Where processing is based on your consent, to receive your personal data in a commonly used electronic format, or ask that we move your personal data in that format to another provider, where your request relates to the personal data that you gave us directly and where technically possible.
- To object to your personal data being processed where we are relying on ours or a third party's legitimate interest to do so or for the purpose of direct marketing.
- To withdraw your consent at any time when processing relies upon consent.

Data subjects may exercise these rights verbally or in writing using our contact information provided in the section below entitled **"how to contact us"** above. We will endeavour to promptly respond to your requests. Where you ask us to provide a copy of your personal data we are legally obliged to respond within one month of such request. If your request is denied, we will inform you about the reasons for denial.

Please note that in order for you to assert these rights, we may need to verify your identity to confirm your right to access your personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. In order to verify your identity, we may need to gather more personal data from you than we currently have.

18. OPT OUT AND UNWANTED COMMUNICATIONS

To opt-out of any future promotional or marketing communications or any other commercial communications from us, you should send a request to us at the contact information in the section entitled **"how to contact us"** above.

19. THIRD PARTY LINKS AND SERVICES

This Site contains links to third party websites and services. Please remember that when you use a link to go from our Site to another website or you request a service from a third party, this Privacy Notice no longer applies to these third-party websites and third-party service providers unless we are acting as joint controllers in respect of your personal data with such third party.

Your browsing and interaction on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. We do not monitor, control, or endorse the privacy practices of any third parties.

This Site may integrate with social networking services. You understand that we do not control such services and are not liable for the manner in which they operate. While we may provide you with the ability to use such services in connection with our Site, we are doing so merely as an accommodation and, like you, are relying upon those third-party services to operate properly and fairly.

20. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain personal data only for as long as is necessary for the purposes described in this Privacy Notice, after which it is deleted from our systems.

If any personal data is only useful for a short period (e.g. for a specific event or marketing campaign or in relation to recruitment), we will delete it at the end of that period. Please note that if you are an unsuccessful candidate we may keep your information for a short period.



If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list so that we know not to send you further marketing communications in the future.

21. PERSONAL DATA OF MINORS

Our Site is not intended for use by, or targeted at, minors (individuals under the age of 18) and we do not knowingly collect personal data of minors. However, due to the nature of our organisation and the Services we provide, we may from time to time collect and process personal data relating to minors. If we do collect personal data of minors, we will comply with all applicable laws and regulations relating to the processing of personal data of minors.



California Consumer Privacy Statement

This California Consumer Privacy Statement (“Statement”) supplements the Hall & Partners Privacy Policy. It applies solely to California consumers and addresses personal information we collect online and offline. This Statement does not apply to Hall & Partners personnel. Sections 2-5 of this Statement do not apply to job applicants.

This Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

1. Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the effective date of this Statement) the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, Social Security number, driver's license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status
- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information
- **Education Information:** education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use (and may have used during the 12-month period prior to the effective date of this Statement) your personal information for the purposes described in our Privacy Policy and for the following business purposes specified in the CCPA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance



- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.
- Managing career opportunities with Hall & Partners.

2. Sources of Personal Information

During the 12-month period prior to the effective date of this Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you, such as when you contact us with a question or comment
- From your devices, such as when you visit our Site
- Our affiliates and subsidiaries
- Vendors who provide services on our behalf
- Social networks
- Government entities
- Data brokers

3. Sale of Personal Information

We do not and will not sell your personal information.

4. Sharing of Personal Information

During the 12-month period prior to the effective date of this Statement, we may have shared your personal information with certain categories of third parties, as described below.

We may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

Category of Personal Information	Category of Third Party
Identifiers	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks
Additional	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks
Protected Classifications	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks
Commercial	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our



business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks

Online Activity	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks
Employment Information	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks
Education Information	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks
Inferences	Our affiliates and subsidiaries; Vendors who provide services on our behalf; Professional services organizations, such as auditors and law firms; Our business partners; Advertising networks; Internet service providers; Data analytics providers; Operating systems and platforms; Social networks

In addition to the categories of third parties identified above, during the 12-month period prior to the effective date of this Statement, we may have shared personal information about you with the following additional categories of third parties: Government entities.

5. California Consumer Privacy Rights

You have certain choices regarding our use and disclosure of your personal information, as described below.

Access: You may have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed and sold about you during the past 12 months.

Deletion: You have the right to request that we delete certain personal information we have collected from you.

How to Submit a Request: To submit an access or deletion request (or to submit a request as an authorized agent on behalf of a consumer) use one of the following options:

Complete our web form available at [California Consumer Rights Request Form](#)
 Email us at privacy@hallandpartners.com
 Call us at 1-833-520-0506.

For questions or concerns about our privacy policies and practices, please contact us as described in “Contact Details” section above.

Verifying Requests: To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you request access to or deletion of your personal information, we may require you to provide any of the following information: your email address, the name of the Hall & Partners representative with whom you typically interact, and the date of your last interaction with an Hall & Partners representative. In addition, if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.



Additional Information: If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

6. Consumer request metrics for calendar year 2021

Hall & Partners believes transparency is critical to maintaining a trusted relationship with our consumers.

To that end, Hall & Partners is further enhancing our transparency with respect to the choices our consumers make regarding personal information. In this privacy transparency disclosure, we are providing metrics on certain requests we received from consumers across the United States during the 2021 calendar year, in compliance with the California Consumer Privacy Act and the California Privacy Rights Act

Requests to know: Hall & Partners received 0 consumer requests to know personal information collected about them.

Requests to delete: Hall & Partners received 0 consumer requests to delete.

Requests to opt out: Hall & Partners received 1 request to opt out of personal information “sales,” complied with 1 of those requests in whole or in part and denied 0 of those requests.

The mean number of days within which Hall & Partners substantively responded to these requests in 2021 was 38 days.



Document Owner and Approval

The Global Head of Governance Risk & Compliance is the owner of this document and is responsible for ensuring that this document is reviewed in line with the requirements in Clause 5.1.2 in the [ISPMS Information Security and Privacy Manual](#).

A current version of this document is available to all members of staff on the corporate intranet and is published externally on the corporate website.

This Terms of Service was approved by the Senior Leadership Team on the date below and is issued on a version-controlled basis under the signature of the Chief Growth Officer (CGO).

Signature: *Peter Teachman*

Date: Dec 29, 2022

Change History Record

Issue	Date	Author	Change Description	Approval
1.0	18/12/20	KLA	Publish	AC
2.0	31/10/22	KLA	Major Version Release	PT
2.1	29/12/22	KLA	EU Rep update	<i>PT</i>

