



Privacy Policy

This is the Privacy Policy of **BSR Global Group Limited** and affiliated subsidiaries.

In this document, "we", "our", or "us" refer to BSR Global Group Limited (BSR).

Introduction

This privacy policy aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this policy, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are strongly committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us and hope that you reciprocate.

Our privacy policy fully complies with current UK law that is implemented, namely the UK Data protection Act 2018 (DPA2018) as well as The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) (DPPEC Regulations), and includes the requirements of the European Union General Data Protection Regulation (EU Regulation 2016/679) also referred to as "GDPR".

The law requires us to tell you about your rights and our obligations to you with regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website or collected by any other means.

If you wish to contact is in regard to our privacy policy you may do so by emailing us at:

info@bsrglobal.com

The Principles of data protection

There are six data protection principles set out under DPA2018. In summary they are that personal data should be:

- Processed fairly and lawfully and in a transparent manner
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and kept up to date
- Kept only for as long as is necessary for those purposes
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The regulations also stipulate that individuals have the following rights:

- To be informed about how their personal data is being used
- To access the personal data held about them
- To request that elements of that data be ported to another service provider
- To request rectification of any mistakes in the data that is held
- To request the erasure of personal data in certain situations
- To request the restriction of processing
- To object to the processing
- To object to any decisions being taken by automated means

BSR Global Group Limited as responsible members of the international business community strictly adhere to these principles and the guidelines for data management set out by the Information Commissioner.

This privacy policy has been created to inform patrons of how we satisfy these requirements as well as providing detailed information about how we protect your privacy rights.

1. Date We Process

- 1.1 We strictly commit to collect all data and personal information in a manner that is lawful, fair and transparent.
- 1.2 We may collect, use, store and transfer different kinds of personal data about you that you provide to us. We have collated these into groups as follows;

- 1.2.1 Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time;
- 1.2.2 Your contact information includes details such as business address, email address, telephone numbers (including mobile phone) and any other information you have given to us for the purpose of communication with you or for holding meetings with you;
- 1.2.3 When visiting our website technical data including your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system or platform and other technology on the devices you use to access our website;
- 1.2.4 Marketing data includes your preferences in receiving marketing from us; communication preferences; responses and actions in relation to your use of our services.
- 1.2.5 Information about your visits to and use of our website including the referral source, length of visit, page views, and website navigation paths;
- 1.2.6 We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile data to assess interest in a product or service.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be used in accordance with this privacy policy.

- 1.2.7 Information, such as your name and email address, that you enter in order to set up subscriptions to our emails and/or newsletters via our website;
- 1.2.8 Information that you may enter when submitting an enquiry via our website such as, your name, your email address, your telephone number and any other details that you may provide to us within your feedback;
- 1.2.9 Any information contained in any communications that you send to us by email, including its communication content and metadata;
- 1.2.10 Any other personal information that you may send to us;

1.2.11 When conducting a business transaction with BSR Global whether as a “buyer”, “Client” or “third-party independent intermediary” we may collect banking information that you provide to us for the purpose of making or receiving any payment, whether for services rendered or for commission earned. This “banking” information may include; account numbers, bank name and bank contact details.

1.3 Before you disclose to us the personal information of another person, you must obtain that person’s consent to both the disclosure and the processing of that personal information in accordance with this privacy policy.

2. Special Personal Information

2.1 Special personal information is classified under law as being data about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

2.2 We do not collect any special personal information about you.

3. If you do not provide Personal Information we need

3.1 Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

4. Security of your personal information

4.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information.

4.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

4.3 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data you send to us over the internet nor can we be held responsible for the loss of any data you send us via the internet.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then, if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

5. Information we process because we have a contractual obligation with you

- 5.1 When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.
- 5.2 In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.
- 5.3 We may use it in order to:
 - Verify your identity for security purposes
 - Sell products to you
 - Provide you with our services
 - Provide you with suggestions and advice on products, services and how to obtain the most from using our website
- 5.4 We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.
- 5.5 We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

6. Information we process with your consent

- 6.1 Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including; job opportunities and our products and services, you provide your consent to us to process information that may be personal information.
- 6.2 Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to register to receive our newsletter.

- 6.3 When registering to receive our newsletter via our website or when you submit an enquiry through the contact page on our website you are giving consent to receive marketing materials and/or newsletter and/or information pertaining to our products or services.
- 6.4 If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.
- 6.5 We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.
- 6.6 You may withdraw your consent at any time by instructing us at info@bsrglobal.com. However, if you do so, you may not be able to use our website or our services further.

7. Information we process for the purposes of legitimate interests

- 7.1 We may process information on the basis there is a legitimate interest, either to you or to us, from doing so.
- 7.2 Where we process your information on this basis, we do after having given careful consideration to:
- Whether the same objective could be achieved through other means
 - Whether processing (or not processing) might cause you harm
 - Whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- Record-keeping for the proper and necessary administration of our business
- Responding to unsolicited communication from you to which we believe you would expect a response
- Protecting and asserting the legal rights of any party
- Insuring against or obtaining professional advice that is required to manage business risk
- Protecting your interests where we believe we have a duty to do so

8. Information we process because we have a legal obligation

- 8.1 Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

8.2 This may include your personal information.

Specific uses of information you provide to us

9. Information provided on the understanding that it will be shared with a third party

9.1 We will not, without your express consent, supply your personal information to any third party other than set out in this privacy policy.

9.2 If you provide us with your personal information in the course of normal business (for example; completing a transaction or for receiving commission payments) then we may share your personal information as follows;

9.2.1 We may disclose your personal information if required to do so in order for us to meet our contractual obligations with you to any of our employees, officers, insurers, professional advisers, bank officers, attorneys, agents, suppliers, or subcontractors as reasonably necessary for us to satisfy our contractual obligations.

9.2.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) as reasonably necessary for us to satisfy our contractual obligations.

9.2.3 The personal information disclosed may including the banking co-ordinates that you have provided us for the purpose of making or receiving payments. However, these shall only ever be disclosed to our own bankers or legal advisors or paymaster attorneys.

10. Complaints regarding content on our website

10.1 Our website does not allow users to post any form of content about himself, herself or any other person.

10.2 The content of the pages of our website is for your general information and use only. It is subject to change without notice.

10.3 If you complain about any of the content on our website, we shall investigate your complaint.

10.4 If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

10.5 If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

11. Information relating to your banking co-ordinates

11.1 When conducting a business transaction with BSR Global whether as a “buyer”, “Client” or “third-party independent intermediary” we may collect banking information that you provide to us for the purpose of making or receiving any payment, whether for services rendered or for commission earned. This “banking” information may include; account numbers, bank name and bank contact details.

11.2 We store information about your banking co-ordinates when you first provide it to us.

11.3 We store this banking information [at your request] in order to either receive payment for goods or services from you or to make commission payments to you.

11.4 We take the following measures to protect your payment information:

- We keep your payment information encrypted on our servers.
- Access to your payment information is restricted to authorised staff only.
- We do not disclose your banking information to any third parties.

11.5 We automatically delete your banking information upon completion of the specific transactions or after twelve (12) months, whichever is sooner.

11.6 We may disclose your banking co-ordinates in the course of normal business and in accordance with Clause 9 above strictly for the purpose of making or receiving payments.

However, these shall only ever be disclosed to our own bankers or legal advisors or paymaster attorneys.

12. Job application and employment

12.1 If you send us information in connection with a job application, we may keep it for up to three (3) years in case we decide to contact you at a later date.

12.2 If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six (6) years before destroying or deleting it.

13. Communicating with us

- 13.1 When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.
- 13.2 We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

14. Complaining

- 14.1 When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.
- 14.2 If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.
- 14.3 We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

15. Affiliate and business partner information

- 15.1 This is information given to us by you in your capacity as an affiliate of us or as a business partner or as an independent intermediary.
- 15.2 It allows us to recognise visitors, buyers or clients that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.
- 15.3 The information is not used for any other purpose.
- 15.4 We undertake to preserve the confidentiality of the information and of the terms of our relationship.
- 15.5 We expect any affiliate or partner or intermediary to agree to reciprocate this policy.

Information we collect through automated systems when visiting our website

16. Cookies

Our website strictly does not use any form of Cookies.

17. Personal identifiers from your browsing activity

- 17.1 Requests by your web browser to our servers for web pages and other content on our website are recorded.
- 17.2 We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.
- 17.3 We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.
- 17.4 If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

18. Our use of re-marketing

- 18.1 We strictly do not use any of the information automatically collected when your visit our website for the purpose of marketing.

19. Consent to data collection

- 19.1 In those cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box and/or submit button and/or inserting contact details on the relevant web form requiring consent, and/or through passing on company contact information to one of our representatives either via telephone, email or on a face to face basis). In doing so you are actively providing us with your consent to collect the data provided, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to the it and what your rights are as a data subject and that you have read and understood this privacy policy.
- 19.2 Our website contains a contact form where visitors may send us messages and/or requests for product information and/or other details about our company. Visitors are advised that by completing this form and entering their contact details they are giving their consent for us to collect any submitted data.

Disclosure and sharing of your information

20. Information we obtain from third parties

- 20.1 Although we do not disclose your personal information to any third party (except as set out in this policy), we sometimes receive data that is indirectly made up from your personal information from third parties.
- 20.2 Such information may include; corporate profile, business references, your name, email address, telephone number or banking information received from third-party independent intermediaries that you have authorised to provide us with that personal information.
- 20.3 When receiving personal information from a third-party (such as an intermediary) we will always verify with you directly that they were authorised to provide us with that information including providing you with the details of the person who gave us your personal information.

21. Third party advertising on our website

- 21.1 Our website does not contain any third-party advertising.
- 21.2 We do include links on our website pages to our partners websites that we feel may be interesting or relevant;
 - 21.2.1 In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you.
 - 21.2.2 They may also use other technology such as cookies or JavaScript to personalise the content.
 - 21.2.3 We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy policy does not cover the information practices of these third parties.

22. Data will be processed outside the European Union

Data will be processed outside the European Union within either the United Kingdom or The United States of America. The handling and management of data outside of the EU will be done so in accordance with the terms and conditions stipulated within the UK Data protection Act 2018 (DPA2018) and The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) (DPPEC Regulations) and those laws defined within the country in which the data is stored, transferred or processed.

- 22.1 Our websites are hosted outside of the European Union (EU) within the United Kingdom (UK).
- 22.2 Information that we collect may be stored, processed in, and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 22.3 We may also use outsourced services in countries outside the United Kingdom or European Union from time to time in other aspects of our business at all times any such data will be handled and managed in accordance with the UK Data Protection Acts.
- 22.4 Accordingly, any data we obtain will be processed outside the European Union and will be held and stored outside of the European Union, namely; within the United Kingdom. Data stored and/or processed within the United Kingdom shall be managed in accordance with UK Data Protection Acts.
- 22.5 Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in either the United Kingdom or European Economic Area: The United States of America, Canada, Singapore or the United Arab Emirates.
- 22.6 We use the following safeguards with respect to data and personal information that is transferred outside the United Kingdom:
- The processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
 - We may for the purpose of making commission payments or from time-to-time other payments provide personal information to our attorneys based either within the United States of America or the United Kingdom. This information shall be protected in accordance with normal 'client privileges' in protecting confidential client information as well as privacy policy controls equivalent to those set forth within in this Privacy Policy.
 - The data protection clauses in our contracts with any third parties are written in full accordance with UK Data protection Act 2018 (DPA2018) and The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) (DPPEC Regulations).
 - We comply with a code of conduct approved by the UK Data protection Act 2018 (DPA2018) as well as The Data Protection, Privacy and Electronic

Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) (DPPEC Regulations).

Control over your own information

23. Your duty to inform us of changes

- 23.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

24. Access to your personal information

- 24.1 At any time, you may review or update personally identifiable information that we hold about you. To obtain a copy of any information that is not provided on our website you should contact us to make that request.
- 24.2 After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

25. Removal of your information

- 25.1 If you wish us to remove personally identifiable information from our database, you should contact us to make your request.
- 25.2 This may limit the service we can provide to you.

26. Verification of your information

- 26.1 When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

27. Objecting to processing of your data

- 27.1 You have the right to request that we stop processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

28. The right to ask us to stop contacting you with direct marketing

- 28.1 You have the right to request that we stop contacting you with direct marketing. On promotional email we provide an 'unsubscribe' link at the bottom of the email which will unsubscribe you from that service.

29. The right to object to automated decision making / profiling

- 29.1 You have the right to request that we stop profiling you in relation to our direct marketing practice. You can inform us and we will deal with your request accordingly.

Other matters

30. Use of our Website by children

- 30.1 We do not sell products or provide services for purchase by children, nor do we market to children.
- 30.2 We do not sell products or provide services whatsoever via our website that maybe considered of an adult nature.
- 30.3 If you are under 18, you may use our website only with consent from a parent or guardian.
- 30.4 We collect data about all users of and visitors to our website regardless of age, and we anticipate that some of those users and visitors will be children. We have no control or method of identifying visitors to our website as being under the age of 18.
- 30.5 Such child users and visitors will inevitably visit other parts of the site and will be subject to whatever on-site marketing they find, wherever they visit.

31. How you can complain

- 31.1 If you are not happy with our privacy policy or if you have any complaint then you should tell us.
- 31.2 If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 31.3 If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>.

We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

32. Retention period for personal data

32.1 Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- To provide you with the services you have requested;
- To comply with other laws, including for the period demanded by our tax authorities;
- To support a claim or defence in court.

Data Retention Periods

For the purpose of marketing	5 years from the point of last contact with you, this may include use of our websites, orders or any responses to communications with you.
Financial records	7 years from the date of the last transaction or invoice date.

33. Compliance with the law

33.1 Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, then we would like to hear from you.

33.2 However, ultimately it is your choice as to whether you wish to use our website or enter into business transactions with us.

34. Review of this privacy policy

34.1 We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted on our website on the day you use our website or on the date on which you enter into a contractual relationship with us. We advise you to request a copy of our Privacy Policy or download a copy from our website. We also further advise you to keep a printed copy for your records.

34.2 If you have any question regarding our privacy policy, please contact us via email at:

info@bsrglobal.com