

PRIVACY STATEMENT

INTRODUCTION

HX Private Clients Ltd is committed to protecting your privacy. This Privacy Statement explains how, and for what purposes, we use the information collected about you in connection with your use of the Concierge Service or our Platform. Please read this Privacy Statement carefully.

By using our services or services offered by external Suppliers, you are agreeing to be bound by this Privacy Statement in respect of the information collected about you in connection with the HX Private Clients service.

IF YOU DO NOT AGREE TO US COLLECTING AND USING THE INFORMATION ABOUT YOU THEN YOU MUST NOT USE HX PRIVATE CLIENTS SERVICES.

1. During your Membership we may collect certain information about you such as your name and contact details. We may also collect information about other family members or third parties where you provide information about those individuals.
2. We collect this information about you so that we can: provide Services to you; allow Suppliers to provide Services to you; run our business; further develop elements of our business; personalise your preferences; contact you; and comply with the law.
3. We may determine the purposes and means of processing personal information that we collect about you and so act as data controller in relation to that personal information and:

i. where you have requested Services from a Supplier, we may disclose your information to Supplier(s) who will process your data for their own purposes as data controllers and/or processors (as the case may be) in relation to providing the Services to you, for example, to provide specific quotes or to make a booking; and ii. each Supplier will be responsible for their own use of your information, and HX Private Clients does not accept responsibility for such use, except to the extent we have not complied with this Privacy Statement or applicable data protection laws.

Capitalised terms used without definition shall have the meanings assigned to them in the HX Private Clients Membership Terms and Conditions.

HOW YOUR DATA IS USED

1. a) Any personal data we process will be used in accordance with applicable data protection laws. We have described below our purposes for processing personal data.
2. b) We may use information you give us or that we collect from you:

i) to provide Service, allow Suppliers to provide Services to you, administer your membership and run our organisation. This is necessary for the performance of our Services to you; ii) to inform you about changes to our Service and Services available from time to time: I. we may use personal data to inform you of information, suggestions, recommendations, products and services that may be of interest. You may be contacted by mail, email, telephone, SMS, WhatsApp or such other means as we regard as appropriate and as legally permitted. Individuals may opt out from this type of communication by calling us or emailing us; II. we

will contact you by e-mail only with information about products and services similar to those which you have previously shown an interest in or which you are likely to be interested in based on preferences you have expressed; iii) to communicate with you. We have a legitimate interest to process this personal data in order to respond to enquiries, requests, complaints or comments submitted to us; iv) to administer, maintain and improve our Service: I. we use “cookies” to monitor website user traffic patterns and website usage. This helps us to understand how visitors use our website so that we can develop and improve the design, layout and functionality. Cookies will make it easier for you to use the website during future visits. A cookie is a piece of information that is stored on your computer’s hard drive and which records your navigation of a website so that when you revisit that website it can present tailored options to you based upon the stored information about your last visit. You can normally alter the settings of your browser to prevent acceptance of cookies. If you do not want us to deploy cookies in your browser, you can set your browser to reject cookies or to notify you when a website tries to put a cookie on your computer. However, rejecting cookies may affect your ability to use some of the products and/or services. For more information about what cookies are and how they work, visit: <http://www.allaboutcookies.org>; II. we have a legitimate interest to process the personal data of our users in order to administer, maintain and improve our website; v) to notify you about changes to this Privacy Statement. This processing is necessary for the performance of our Services to you; vi) for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. We have a legitimate interest to process the personal data of our users for our internal operations; vii) to allow you to participate in interactive features of our Service. This processing is necessary for the performance of these Services to you; viii) as part of our efforts to keep our systems safe and secure. We have a legitimate interest to process the personal data of our users to keep our systems safe and secure; and ix) to comply with any legal or regulatory obligations to which we or regulators or law enforcement agencies are subject. This processing is necessary for compliance with a legal obligation to which we, our users or the regulator/law enforcement agencies are subject.

c) If you have any questions about how we use your data, please contact HX Private Client’s Data Protection Officer at HX Private Clients, 23 Berkeley Square, Mayfair, London, W1J 6HE or email or phone us and ask to be transferred to our Data Protection Officer.

HOW WE LOOK AFTER YOUR DATA

We follow strict guidelines in the storage and disclosure of personal data and communications that you have given us to prevent unauthorised access to it.

HOW WE COLLECT DATA FROM YOU

a) We may collect and process the following information in accordance with applicable data protection laws:

i) contact information (such as email address or phone number) provided to us when you first use the our Service or provided to us, to validate such registration and for password reset purposes;

ii) information provided if you contact us via: the online form submission with an enquiry; through any telephone, SMS, WhatsApp conversation or email exchange with our representatives; or in response to a communication from us. Calls will be recorded for quality control and training purposes which includes the usage of the recordings for the handling of claims and fraud detection purposes. Recordings are kept for a limited amount of time and automatically deleted thereafter, unless we have a legitimate interest to keep such recording for a longer period, including for fraud investigation and legal purposes;

iii) we may be provided with certain personal data such as your name, email address and information contained in the correspondence (which could tell us something about your preferences). We need this information to be able to respond to your enquiries;

iv) details of registration, enquiries, discussions, instructions, transactions you carry out in relation to or Services via phone or email interaction with our representatives, including but not limited to: your name; subject matter which you have expressed as an interest or preference; order information; billing information; address; type of subscription; hashed payment details; including whether payments have been accepted or declined. We need this information to be able to provide the Travel and Concierge Service;

v) information provided when you visit our website. We capture access data such as: IP address; browser type and version; time zone setting, browser plug-in types and versions; operating system and platform; date and time of the access; articles you have read; requests made; or the amount of data transmitted and the requesting provider. We may also capture other information about visits to our website such as: website usage; traffic patterns and topics of interest. The main purpose of collecting this information is to administer, maintain and improve our Service (please see section 2. below for further details) and your experience in using our website; and

vi) from your IP address, we may be able to identify your city or country of location and this may be used to display geographically relevant information to you on our Platform.

b) Where you provide us with information about other people, you confirm that: (i) you have the consent or authorisation from the individuals to pass this information to us; and (ii) you have notified them of, and they have agreed to, the collection and use of their information as set out in this Privacy Statement.

c) We are required to comply with certain legal and regulatory requirements, and may process your personal data for compliance with such legal or regulatory obligations, to which we or regulators or law enforcement agencies are subject.

d) Note that if any of your personal details change during your use of our membership, you are responsible for updating them by contacting us.

e) You may store your payment card details with us. We reveal only the last four digits of your credit card numbers when confirming an order. However, we transmit the entire credit card number to the appropriate credit card company during order processing.

WHEN DO WE GIVE YOUR DATA TO OTHER PEOPLE?

a) We may share your information (including any of the data we have collected as mentioned in section 1. above) with selected third parties including Suppliers and other third parties for the performance of any contract you enter into with them or otherwise required to provide the Travel & Concierge Services to you.

b) We may share data we collect about you with your

c) We may also share aggregated, anonymised information with your third parties to show trends about the general use of the Travel & Concierge Service.

d) We may share your personal data with the third parties set out below in the course of or connected to providing the Travel & Concierge Services to you : i) Suppliers; ii) Internal Third Parties; and iii) External Third Parties. iv) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

e) We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third- party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

WHERE WE STORE YOUR DATA

a) By using the Travel & Concierge Service, you acknowledge that in order to perform the Travel & Concierge Service, allow you to receive the Services from Suppliers in relation to the Travel & Concierge Service, we may need to transfer your personal data outside of your country to countries where HX Private Clients has an office or to countries where a Supplier is needed to fulfil a request for you. These countries may not have the same data protection laws as the country where you initially provided the information. When we transfer or disclose your information, we will protect that information as described in this Privacy Statement.

b) Where we transfer your personal data outside of the country in which you are based, we will rely on appropriate safeguards to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses, or applicable data protection laws in your country.

RETENTION OF YOUR DATA

a) We take appropriate measures to ensure that any personal data is kept secure. We will store your personal data for the duration of your membership with us.

b) If your access to the Travel & Concierge Service expires or is terminated, we will continue to store your personal data for a period of time in line with legal, regulatory, financial and business requirements. We also keep a record of correspondence in line with legal, regulatory, financial and business requirements.

ACCESS TO YOUR DATA AND YOUR RIGHTS

a) As a result of us collecting and processing your information, you may have the following legal rights subject to the data protection laws in your country

i) to access personal data held about you; ii) to request us to make any changes to your personal data if it is inaccurate or incomplete; iii) to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances; iv) to receive your personal data provided to us as a data controller in a usable way in certain circumstances; v) to object to, or restrict, our processing of your personal data in certain circumstances; vi) to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you; vii) where our processing of your personal data is based on your consent you have the right to withdraw consent at any time by contacting us; and viii) to lodge a complaint with a data protection supervisory authority. If you

need the details of the data protection supervisory authority in your country, if any, please contact the Travel & Concierge Service and we will be able to provide this information.

b) To exercise any of your rights as set out above, please contact HX Private Client's Data Protection Officer, HX Private Clients, 23 Berkeley Square, Mayfair, London, W1J 6HE or email or phone the Travel & Concierge Service and ask to be transferred to our Data Protection Officer.

LINKS

a) Our correspondence with you may, from time to time, contain links to and from other websites and services, for example third party payment processors. If you follow a link to any of these websites, please note that: i) we are not responsible for the content or reliability of websites linked to or from our Platform; ii) we do not necessarily support the views expressed within linked websites and our including a link to a website should not be taken as an endorsement of any kind; iii) we cannot guarantee that these links will work all of the time and have no control over the availability of the linked pages; and iv) these linked websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.