

Data Privacy Notice

1. INTRODUCTION

Madsen Advisory Limited ("Madsen") is committed to protecting and respecting your privacy.

We pledge to handle your data fairly and legally at all times and are committed to being transparent about what data we collect about you and how we use it.

This notice, which applies whether you visit our website, or communicate with us via email, post or telephone provide details of:

- how we use your data
- what personal data we collect
- how we ensure your privacy is maintained
- your legal rights relating to your personal data

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

2. DEFINITIONS

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject - A person

Categories of data - Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation, or set of operations, which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

3.WHO ARE WE?

Madsen is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are Madsen Advisory Limited, Little Friars, Great Chart, Kent TN23 3DH. For all data matters contact Mark Madsen on mark@madsenadvisory.com.

4.THE PURPOSE(S) OF PROCESSING YOUR PERSONAL DATA

We collect and use Personal Data as permitted by law for the legitimate interests of providing our products and services to our clients. We only process Personal Data that is relevant to the products and services that we provide and only for the purposes compatible with those for which the Personal Data was collected, received or otherwise authorised.

For client, media and supplier specific Personal Data, the purposes of processing may include:

- Day-to-day business relationships
- Business development activities
- Provision of Madsen's services
- Carrying out Madsen's obligations under client/supplier contracts and processing of financial transactions
- We use the media Personal Data to identify relevant media contacts to maintain a dialogue and manage reputation through dissemination of market information, announcements and industry-relevant content.

5.THE CATEGORIES OF PERSONAL DATA CONCERNED

The Personal Data collected may include:

- Contact information, such as name, postal address, email address and telephone number
- Personal Data that business associates provide in emails or written communications and other data collected automatically through the website (such as IP addresses, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our website, and dates and times of website visits).

- Financial information for contractual obligations.
- Madsen also may obtain and use Personal Data in other ways for which Madsen provides specific notice at the time of collection .
- Media contact information such as name, contact information, biographical information, career history, employment details, article headings and citations, Social media handles, personal interests
- We never collect special categories of personal data

6.SHARING YOUR PERSONAL DATA

Your personal data will be treated as strictly confidential and will not be shared with anybody else.

7.HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Madsen will process personal data during the duration of any contract and will continue to store only the personal data needed for six years after the contract has expired to meet any legal obligations. After six years any personal data not needed will be deleted.

8.YOUR RIGHTS AND YOUR PERSONAL DATA

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is

necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable ie where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

You may access, correct, update or delete your Personal Data by contacting us, using the details below. We will make every effort to respond to any requests within a month. We may need to verify your identity before providing access to your Personal Data.

9.TRANSFER OF DATA ABROAD

We do not transfer personal data outside the EEA.

10.AUTOMATED DECISION MAKING

We do not use any form of automated decision making in our business.

11.FURTHER PROCESSING

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

12.CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back to see any updates or changes to our privacy policy.

13.SECURITY OF YOUR DATA

Madsen is committed to taking appropriate technical, physical and organisational measures to protect Personal Data against unauthorised access, unlawful processing, accidental loss or damage and unauthorised destruction.

14.CONTACT

Questions regarding this Privacy Notice or the privacy practices of Madsen generally can be mailed or emailed to: Mark Madsen, Data Protection Officer, Madsen Advisory Limited, Little Friars, Great Chart, Kent TN23 3DH. mark@madsenadvisory.com. 07802 754582.