Privacy Policy for Boston Morgan

This policy explains how we use the personal data we collect from you when you use this website.

We are Boston Morgan Limited. Registered office: Acre House, 11/15 William Road, London NW1 3ER. Registered in England & Wales number: 09647880.

For the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR), we are the data controller for the personal information we process. We are registered as a data controller with the Information Commissioner's Office. Reference number: ZA813498

The data we collect

We collect and process the following types of data:

- The details you give us (e.g. name, email address, phone number), when you contact us via email, post, telephone or face to face.
- The information we collect about you when you visit our website. Typically this is done through the use of data files called "cookies", including the cookies set by our web hosting service, Wix. See the section on Cookies below for more details.

How we use the data

We may use the information we collect about you to:

- Contact you in response to your queries
- Provide you with services, if you are a client
- Comply with laws and regulations
- Comply with our policies, e.g. information security
- Maintain and improve our website performance

Under the GDPR, the lawful bases we rely on for processing this information are:

- We have a contractual obligation (e.g. to clients)
- We have a legitimate interest

Data storage

The data is stored on a secure server and we conduct regular reviews to ensure we retain data only for as long as is necessary for the purposes for which it was processed. Data retention periods for cookies are listed in the Cookies section below.

Your data protection rights

You have data protection rights, including the right to request that we:

- Give you copies of your personal data
- Correct any information you believe is inaccurate or incomplete
- Erase your personal data, in certain circumstances

- Restrict the processing of your personal data, in certain circumstances
- Transfer the data we have collected to another organisation, or directly to you, in certain circumstances

You also have the right to object to our processing of your personal data, in certain circumstances.

If you make a request, we have one month to respond to you.

If you have any questions or concerns about the way we handle your personal information, or you would like to exercise your data protection rights, please <u>contact us via email</u> or write to us at Boston Morgan Limited, Acre House, 11/15 William Road, London NW1 3ER.

If you feel we have not addressed your concern satisfactorily, you may raise it with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or at https://ico.org.uk/concerns.

We regularly review our Privacy Policy, publishing updates on our website.

Cookies

Cookies are small pieces of data stored in your browser when you visit a website. Typically they are used to keep track of the settings you have selected and the actions you have taken on a site.

When you visit our website, we may collect information from you automatically through cookies or similar technology.

How we use cookies

Cookies are placed by our web hosting service, Wix, to monitor the performance of the hosting platform, ensure it is secure and safe to use and enhance the experience of users. Most of these cookies are categorised as essential. They are listed in the table below.

Cookie Name	Purpose	Duration	Туре
XSRF-TOKEN	Security	Session	Essential
hs	Security	Session	Essential
svSession	Used in connection with user login	2 years	Essential
SSR-caching	To indicate the system from which the site was rendered	1 minute	Essential
wixCIDX	System monitoring / debugging	3 months	Essential

Cookie Name	Purpose	Duration	Туре
wix_browser_sess	System monitoring / debugging	Session	Essential
consent-policy	Cookie banner parameters	12 months	Essential
smSession	To identify logged-in site members	Session	Essential
TS*	Security and anti- fraud	Session	Essential
bSession	System effectiveness measurement	30 minutes	Essential
fedops.logger.sessionId	Stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional

How to manage cookies

When you visit our site for the first time, a pop-up cookie banner allows you to indicate which types of cookies you agree we can use when you visit our site.

You can set your browser not to accept cookies – the website allaboutcookies.org explains how.

Note that if you choose not to accept cookies, some of our website features may not function.

Privacy policies of other websites

Our website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read its privacy policy.

9 January 2021