



Privacy Policy

Purpose of our policy

- Yes Growth Ltd (Company number 08540463) (**YG, we, us or our**) provides the products and services offered on the YG website www.yesgrowth.com (**Platform**).
- For the purposes of the *Data Protection Act 1998* and *General Data Protection (Regulation)*, coming into effect on the 25th of May 2018, we are the data controller.
- We have adopted this policy to ensure that we have standards in place to protect the data that we collect about individuals that is necessary and incidental to:
 - providing the products and services that we offer; and
 - the normal day-to-day operations of our business.
- By publishing this policy, we aim to make it easy for our users, customers and the public to understand what data we collect and store, why we do so, how we receive and/or obtain that information, and the rights an individual has with respect to their data in our possession.

• WHO AND WHAT THIS POLICY APPLIES TO

- We handle data in our own right and also for and on behalf of our customers.
- Our policy does not apply to information we collect about businesses or companies; however, it does apply to information about the people in those businesses or companies which we store.
- The policy applies to all forms of information, physical and digital, whether collected or stored electronically or in hardcopy.
- If, at any time, an individual provides data or other information about someone other than himself or herself, the individual warrants that they have that person's consent to provide such information for the purpose specified.
- YG is not available to children (persons under the age of 18 years).

• THE INFORMATION WE COLLECT

- In the course of business, it is necessary for us to collect data. This information allows us to identify who an individual is for the purposes of our business, share data when asked of us, contact the individual in the ordinary course of business and transact with the individual. Without limitation, the type of information we may collect is:
 - **Personal Information.** We may collect personal details such as an individual's name, location, date of birth, photograph, passport, driver's license and other information that allows us to identify who the individual is;
 - **Contact Information.** We may collect information such as an individual's email address, mobile and/or landline telephone number, third-party usernames, residential and business address, and other information that allows us to contact the individual;
 - **Financial Information.** We may collect financial information related to an individual about payments made and received, such as the date, amount, currency and the details of the payee or payer and other information that allows us to transact with the individual and/or provide them with our services;

- **Statistical Information.** We may collect information about an individual's online and offline preferences, habits, movements, trends, decisions, associations, memberships, finances, purchases and other information for statistical purposes;
- **Device Information.** We may collect device-specific information, such as the hardware model, operating system version, advertising identifier, unique application identifiers, unique device identifiers, browser type, language, wireless network, and mobile network information (including the mobile phone number).
- **Information an individual sends us.** We may collect any personal correspondence that an individual sends us, or that is sent to us by others (such as credit reference or fraud prevention agencies) about the individual's activities, including activities with our third-party partners.
- We may collect other data about an individual, which we will maintain in accordance with this policy.
- We may also collect anonymous non-data about an individual such as information regarding their computer, network and browser (including an IP address).

- **HOW INFORMATION IS COLLECTED**

- Most information will be collected in association with an individual's use of YG, our products and services, an enquiry about YG or generally dealing with us. However, we may also receive data from other sources such as advertising, an individual's own promotions, public records, mailing lists, contractors, staff, recruitment agencies and our business partners. In particular, information is likely to be collected as follows:
 - **Registrations/Subscriptions/Purchases.** When an individual registers, subscribes and or purchases a product, service, connection or other process whereby they enter data details or grant access to information in order to receive or access something, including a transaction or services;
 - **Partners.** When an individual grants us access to their accounts or allows information to be shared by our business partners.
 - **Supply/Contact.** When an individual supplies us with goods or services or contacts us in any way;
 - **Pixel Tags.** Pixel tags and web beacons may enable us to send email messages in a format customers can read and they tell us whether mail has been opened.
 - **Shareholder Information.** We collect information from each of our shareholders, such as the name, date of birth and address.
- As there are many circumstances in which we may collect information both electronically and physically, we will endeavour to ensure that an individual is always aware of their data being collected, in particular by third parties.
- We may also collect anonymous non-data, which may be used and shared on an aggregated and anonymous basis.

- **HOW DATA IS STORED**

- The data that we collect from you will be stored in the European Economic Area (**EEA**), but may be transferred to, and stored at, a destination outside the EEA, with and by third parties.
- Data may also be processed by third parties and/or staff operating outside the EEA who work for us or for one of our third-party partners. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.
- We will retain data for the period necessary to fulfil the purposes outlined in this policy unless a longer retention period is required or permitted by law.
- By consenting to our Privacy Policy, you agree to this transfer, storing or processing.

- **WHEN DATA IS USED**

- In general, we will only use any data for the purpose for which it was collected, except with the individual's permission. The purpose of collection is determined by the circumstances in which the information was collected and/or submitted.
- Information is used to enable us to operate our business, especially as it relates to an individual. This may include:
 - the provision of YG and related services to an individual;
 - verifying an individual's identity;
 - communicating with an individual about:
 - their relationship with us;
 - our services;
 - our marketing and promotions to customers and prospects; and/or
 - competitions, surveys and questionnaires;
 - marketing and promotions to customers and prospects;
 - investigating any complaints about or made by an individual, or if we have reason to suspect that an individual is in breach of any of our terms and conditions or that an individual is or has been otherwise engaged in any unlawful activity;
 - carrying out regulatory checks and meeting our obligations to our regulators;
 - preventing and detecting fraud, money laundering and other crime (such as identity theft);
 - preparing high-level anonymised statistical reports, which would contain details such as the average number of company directors being authorised signatories to a company's accounts. The information in these reports is never personal and you will never be identifiable from them. We may share these statistical and anonymised reports with third parties including non-YG companies; and/or
 - as required or permitted by any law (including the Act).
- If you publicly post about YG, or communicate directly with us, on a social media website, we may collect and process the data contained in such posts or in your public profile for the purpose of addressing any customers services requests you may have and to monitor and influence public opinion of YG.

- **WHEN DATA IS DISCLOSED**

- Upon your authorisation and instruction, to your advisers (such as accountants, lawyers, financial or other professional advisers).
- It may be necessary for us to disclose an individual's data to third parties in a manner compliant with the Act in the course of our business, such as for processing activities like verification, due diligence, website hosting, data analytics and payment processing.
- We will not disclose or sell an individual's data to unrelated third parties under any circumstances unless we employ other companies to perform tasks on our behalf and we need to share your information with them to provide products and services to you.
- There are some circumstances in which we must disclose an individual's information:
 - where we reasonably believe that an individual may be engaged in fraudulent, deceptive or unlawful activity that a governmental authority should be made aware of;
 - as required by any law (including the Act) including court orders;
 - as required by UK and overseas regulators and authorities in connection with their duties, including the regulator or authority having access payment details (including information about others involved in the payment);

- fraud prevention agencies, in particular, we will always tell fraud prevention agencies if you give us false or fraudulent information. They will also allow other organisations (in the UK or abroad), including law enforcement agencies to access this information to prevent and detect fraud, money laundering or other crimes; and/or
- in order to sell our business (as we may transfer data to a new owner).
- We will not disclose an individual's data to any entity outside of the United Kingdom that is in a jurisdiction that does not have a similar regime to the Act or an implemented and enforceable privacy policy similar to this policy. We will take reasonable steps to ensure that any disclosure to an entity outside of the United Kingdom will not be made until that entity has agreed in writing with us to safeguard data as we do.
- If the Company gets involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of all or some portion of the business to another company, we may share information with that company before and after the transaction closes.

- **THIRD PARTY SERVICES, WEBSITES AND ACCOUNTS**

- We may share an individual's information with third party service providers in connection with the provision of YG and related services to you, and otherwise operating our business, marketing and promoting our products and services.
- For example, we may share an individual's information as follows:
 - authentication of identity, passport and driver's license;
 - all information may be processed and stored with cloud service providers (such as dropbox);
 - information may be required to communicate with an individual (such as Gmail from Google, Inc);
- When entering into such contracts with third parties we take all reasonable precautions to ensure their privacy policy abides by the same principles held in this policy.
- When you click on links to third party websites. We may link your account with a third party to our services to enable certain functionality, which allows us to obtain information from those accounts.
- When linking your account with third parties, you must read the privacy policies of such providers, so that you can understand the manner in which they will handle your personal information. The information we may obtain from those services often depends on their privacy policies or account settings.
- These service providers may be located or have facilities that are located a different jurisdiction (including outside the EEA), in which case your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

- **COOKIE POLICY**

- Our Platform may use cookies to distinguish you from other users of our Platform. This helps us to provide you with a good experience when you browse our Platform and also allows us to improve our Platform. Your consent will be obtained prior to our use of cookies on our Platform and you are able to revoke that consent following the procedure below.
- A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device if you agree. Cookies contain information that is transferred to your device's hard drive. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Platform for which we require the use of cookies.
- Please refer to our Cookie Policy stated in our [Website Policies](#) for further information.

- **CONSENT TO COLLECTION OF DATA**

- You may opt to not have us collect your data and communicate with you at certain times. This may prevent us from offering you some or all of our services and may terminate your access to YG, or other services you access with or through us.
- **Opt In.** Where relevant, you will have the right to choose to have your information collected and/or receive information from us; or
- **Opt Out.** Where relevant, you will have the right to choose to be excluded from some, if not all, information collection, and/or the receiving of that information from us. You may revoke your consent at any time, and the decision to opt out should be made through the same media by which you opted in.
- If you believe that you have received information from us that you did not opt in to receive, you should contact us on the details provided at the bottom of this page.

- **THE SAFETY & SECURITY OF DATA**

- We will take all reasonable precautions to protect your data from unauthorised access. This includes appropriately securing our physical facilities and electronic networks.
- Examples of such precautions include:
 - Data encryption
 - Firewalls
 - Intrusion detection systems
 - Physical protection of premises where data is stored (24/7)
 - Background checks for all employees accessing our physical facilities
- The security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. Each individual that provides information to us via the internet or by post does so at their own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, data where the security of information is not within our control.
- Privacy or security practices of any third party (including third parties that we are permitted to disclose your data to in accordance with this policy or any applicable laws) may be subject to separate privacy and security policies than that of YG.
- If you suspect any misuse or loss of, or unauthorised access to, your data, you should let us know immediately.
- We are not liable for any loss, damage or claim arising out of another person's use of the data where we were authorised to provide that person with the data.

- **HOW TO ACCESS AND/OR UPDATE INFORMATION**

- Current regulation gives you the right to request from us the data that we have about you.
- If you cannot update your own information, we will correct any errors in the data we hold on you within one month of receiving written notice from you about these errors.
- It is your responsibility to provide us with accurate and truthful data. We cannot be liable for any information that is provided to us that is incorrect.
- We may charge a you a reasonable fee for our costs incurred in meeting any of your requests to disclose the data we hold on you, if such a request is manifestly unfounded or excessive. We reserve the right to clarify the specific information your request relates to.
- Information will be provided within one month of receipt of the request.
- You have the right to request that information held on you by YG is erased, where there are no additional legal and/or regulatory requirements for YG doing so.

- **COMPLAINTS AND DISPUTES**

- You have the right to object to:
 - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
 - direct marketing; and
 - processing for purposes of scientific/historical research and statistics
 - unless we hold compelling legitimate grounds for processing or the processing is for the establishment, exercise or defence of legal claims.
- You can choose how you would like to receive marketing and other non-business critical communications.
- Any changes made to these contact preferences can take up to 72 hours to come into effect.
- If you have a complaint about our handling of your data, you should address this complaint in writing to the details provided at the bottom of this page.
- You have the right to lodge a complaint with a supervisory authority if you consider that the processing of your data infringes the General Data Protection Regulation.
- If you lodge a dispute regarding your data, we both must first attempt to resolve the issue directly between us.
- If we become aware of any unauthorised access to your data which is likely to result in a high risk for the rights and freedoms of the data subjects, we will inform you without undue delay after becoming aware of it, once we have established what was accessed and how it was accessed.

- **ADDITIONS TO THIS POLICY**

- We reserve the right to modify this policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Platform. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.
- If we decide to change this policy, we will post the changes on our Platform at www.yesgrowth.com. It is your responsibility to refer back to this policy to review any amendments.

- **CONTACTING US**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to jon.harrison@yesgrowth.com.