

## Privacy Notice

This Privacy Notice explains how we collect, use, disclose, and protect your personal information in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable laws, including Financial Conduct Authority (FCA) regulations and anti-money laundering (AML) requirements. We believe in being open and transparent, so we encourage you to read this notice carefully. If you have any questions, please feel free to contact us.

### Who is the Data Controller?

Bright Harbour Advisory is the Data Controller for your personal data. Our correspondence address is 30 St. John's Lane, London, EC1M 4NB and we can be contacted on 020 7870 6400 or info@brightharbour.co. We are a corporate finance firm authorised and regulated by the Financial Conduct Authority (FCA). Our principal activities include advising on corporate finance transactions, mergers and acquisitions, fundraising, and other regulated financial activities.

### How do we use your personal data?

We use your personal data for the purposes of developing and managing commercial relationships with clients, prospective clients and potential investors / purchasers. We will also use personal data during engagements for communication and activities related to the services we have agreed to provide for all parties involved. The personal data we use is obtained through personal contact, referrals from third parties or through our research and marketing activities. Our lawful basis under the UK GDPR for this activity 'legitimate interest' as defined by Article 6.1.f UK GDPR. Our legitimate interests are:

- Enhancing and developing our service offerings.
- Managing commercial relationships and communications.
- Conducting due diligence on potential transactions.
- Protecting our commercial interests and reputation.
- Pursuing our business growth and development objectives.

As we are business regulated by the Financial Conduct Authority in the United Kingdom, we will process personal data for the purposes of complying with legislation such as the Anti Money Laundering and Terrorist Funding Regulations. These regulatory requirements require that we conduct certain verification checks and our lawful basis for undertaking this data processing is 'legal obligation' as defined by Article 6.1.c UK GDPR.

If you fail to provide the information we need to commence a commercial engagement, we will be unable to provide our services to you.

## **What personal data do we process?**

We will collect personal data relating to your identity and contact details, such as your name, address, email address and telephone number. We will also collect business data including directorships, shareholdings, investment history and business interests. Over the course of our engagement, we will collect transaction data such as details of your interactions with us, including transactions and advisory services.

For our regulatory requirements, we will collect financial data, including bank account details and source of funds. We will require verification of address and validation of identity which could include passport details, government identity cards etc.

We collect data through our website analytics some of which may identify you, such as an IP address. Our Cookie Policy details the cookies we use and you can manage your preferences through our cookie consent platform.

## **Who are the recipients of your data?**

As a general principle, we will not transfer your personal data to other recipients without your permission. There are some exceptions to this such as:

- We might be obliged to disclose personal information in response to a request from the Financial Conduct Authority, His Majesty's Revenue and Customs, a court order or other lawful obligation.
- We may share your data as part of a sale, transfer, or merge part of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.
- We use trusted third-party service providers for 'know your client' and anti-money laundering verification providers, auditors, IT service providers.
- We use professional advisers such as Lawyers, accountants, and specialist consultants where necessary.
- We will disclose personal data to other parties as required by law or in connection with corporate transactions.
- We use a cloud infrastructure to securely manage our data storage and for communication purposes.

### **Do we transfer your data outside of the UK?**

We do not transfer your personal data outside of the United Kingdom except where we disclose information relevant to the transaction on behalf and at the direction of our clients.

### **How long do we keep your data?**

We only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including to comply with any legal obligations. For example, we will retain personal data of our clients required for HMRC audit for 7 years. Personal data collected for anti-money laundering purposes will be retained for a minimum of 5 years but not exceeding 10 years.

### **These are your rights.**

The UK GDPR provides you with several rights in relation to the data we process.

- You have the right to get access to and copies of your personal data.
- You can ask us to rectify any inaccurate information we may be holding.
- You have the right to object to the processing of your data.
- You can request we restrict our processing of your data.
- You can ask us to erase your personal data if it is no longer required for the purpose we collected it or have no legal obligation to retain it.
- You also have rights in relation to data portability.

If you want to exercise any of these rights, please contact us using the above contact details.

You also have the right to lodge a complaint about our processing with a supervisory authority, in the UK, this is the Information Commissioner's Office.

The Information Commissioner's Office  
Wycliffe House, Water Lane,  
Wilmslow,  
Cheshire SK9 5AF.  
Helpline number: 0303 123 1113

### **Changes to This Notice**

We may update this privacy notice from time to time. Any significant changes will be posted on our website, and we will notify you if appropriate. This privacy notice was last updated in May 2025.