Public Privacy Notice

Macrosynergy Limited (referred to as "Macrosynergy", "we", "our", "us") are strongly committed to protecting personal data.

This privacy notice is intended to provide you with a better understanding of our privacy policy, describes why and how we collect, use and share personal data, and provides information about individuals’ rights in relation to the personal data we hold. We may use personal data provided to us for any of the purposes described here or as otherwise stated at the point of collection.

The policies and procedures adopted by Macrosynergy with respect to the control or processing of personal data may be amended from time to time. Similarly, the purposes for which we may control or process personal data may change from time to time. Any changes will be made available on our website.

Personal data is any information relating to an identified or identifiable living person. Macrosynergy processes data for numerous reasons, and the means of collection and the lawful basis of processing, use, disclosure and retention periods for each purpose may differ.

Business contacts

Macrosynergy collects limited personal information about all our business contacts to help us serve your needs and offer you advisory services. This information is received through a variety of sources, including directly from you through conversations and emails to discuss your interest and eligibility use of our services. We collect this data in a Customer Relationship Management “CRM” system. The addition of personal data to the CRM system will include the name, organisation, title and business contact details including telephone and email. In addition, the CRM system will collect and store data contained in emails, calendar invites and notes of conversations in respect of interactions between Macrosynergy and these contacts.

Use of this data:

- developing a business relationship;
- understanding the eligibility and suitability of our services; and/or
- sending reports and information.

Macrosynergy does not release this personal data.

If you have given your consent to receive information from us, and you wish to withdraw it, please refer to the section entitled ‘Contact us’ below. You will have the opportunity to unsubscribe from any or all communications from Macrosynergy every time we contact you.

If you don't want to receive marketing content from us, please note that we may still be required to send you information regarding factual, transactional and/or servicing information in connection with...
products or services that we are providing to you or the organisation through whom you are known to us.

Retention of personal information

Personal data is kept in the CRM system for as long as it is necessary to keep a record of the relationship with the business contact.

Recruitment applicants

Macrosynergy collects data about individuals who send us information through email unsolicited or via a recruitment consultant. This includes the name, address, email, Curriculum Vitae (“CV”) and covering letter. We may seek to contact third parties about this individual and retain this information alongside any notes with the CV.

Use of this data:

Retaining the most basic of data will enable Macrosynergy to:

- assess whether an individual would be an appropriate fit for the firm;
- prevent duplication of effort;
- honor any contracts with recruitment consultants re introductions; and
- understand previous interactions with the individual and the outcome of those interactions.

Retention of personal information

The personal data of those candidates who are unsuccessful will be retained for two years after which their CV will be deleted. A record of the name and email will be retained along with the method of introduction and the notes of the decision to allow us to fulfil the business needs as described above.

Visitors to the building

Macrosynergy has security measures in place and building access controls.

We require visitors to report to Reception where visitors’ names are logged, and we keep a record of visitors (name and organisation) in our Calendars.

Visitors to the website

Macrosynergy has a webpage which does not collect any personal data. However, it use cookies in order to enhance the user experience. You will be given the opportunity to exit the webpage if you are not comfortable with this.

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, Macrosynergy do not sell or share your personal information to any unaffiliated company,
group or individuals except to provide products or services you have requested, when we have your permission or where necessary to:

- competent authorities (including tax authorities), courts and bodies as required by applicable law or governing bodies or requested by such entities or to affiliates for internal investigations and reporting.

**International Transfers**

While processing your personal data some of it may be transferred to, and stored at, a destination outside of the UK. These transfers could happen, for example, where your personal data is processed by one of our suppliers who are based outside the UK or who uses data storage facilities outside the UK, or where we are legally required to transfer personal data as set out above.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (for example, standard data protection clauses adopted by the UK);
- a UK decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

Further information on specific mechanisms utilised by Macrosynergy transferring personal data outside the UK and the countries to which such transfer may be made may be obtained from Macrosynergy upon request. Please refer to ‘Contact us’ section below.

**Confidentiality and security**

- We take data security, whether held by us or non-affiliated third parties who perform services for us, very seriously. We maintain physical, electronic and procedural safeguards in compliance with applicable laws and regulations to protect your information which we regularly review.
- Information provided by us to employees, affiliates and non-affiliated third parties who perform services for us, is subject to contractual agreement which prohibits these parties from disclosing or using the information other than for the purposes for which the information was disclosed.
- We restrict access to your personal information to those who need to know that information to provide products or services to you in order to do their jobs.
- We maintain physical, electronic and procedural safeguards that comply with applicable standards to protect your personal information and which we believe are adequate to prevent unauthorised access or disclosure.
- We regularly evaluate our technology to ensure the safeguards we have in place maintain a high level of security and confidentiality.
Any person who is authorised to have access to your information is required to keep such information in a secure location as of the close of each business day.

All electronic or computer files containing such information are password secured and firewall protected from access by unauthorised persons.

Individual’s rights and how to exercise them

Under the Data Protection Act 1998 you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress; and
- to require us not to send you marketing communications.

You also have the following additional rights:

- to require us to correct the personal data we hold about you, if it is incorrect;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than within one month after of receipt of your request. In exceptional cases, we may extend this period by two months, and we will tell you why. We may request proof of identification to verify your request. For more details in relation to your rights, including how to exercise them, please refer to the details in the “Contact us” section below.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Contact us

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact:

- by email: compliance@macrosynergy.com;
- by telephone: 0207 3992700; or
- by post: The Privacy Team at Macrosynergy, 34 St James’s Street, London, SW1A 1HD.
Complaints

We hope that you won’t ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to compliance@macrosynergy.com. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the Information Commissioner’s Office (“ICO”) (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the ICO website (https://ico.org.uk/).

This policy was updated 31 March 2021.