

Winterbrook Privacy Statement

Thank you for taking the time to read our Privacy Statement.

Winterbrook Capital Limited (“Winterbrook”, “we”, “us”, “our”) respects the privacy of visitors to its website and is committed to the protection of their personal information.

The purpose of this Privacy Statement is to explain what Winterbrook does with personally identifiable information that you provide to us via this website www.winterbrook.com (the “Site”), such as your name, mailing address or email address, and any other information which is 'personal data', as defined in the Data Protection Act 1998 (“**personal data**”). The sections of this Privacy Statement below explain more about how your personal data will be gathered, protected, shared and for what purposes we will use that personal data.

Binding nature

By accessing and using the Site, you agree and consent to the collection, transfer, processing, use and disclosure of your personal data as outlined in this Privacy Statement.

Collection of Information

Some of our services require registration. Your registration on the Site and provision of your personal data allows us to send you information that you request or to contact you about Winterbrook services on either a one-time basis or longer, provide you with tips, helpful information, product news and updates and/or seek your views on our services. Registration is optional but if you choose to withhold any personal data requested by us, please note that it may not be possible for you to gain access to certain parts of the Site or for us to provide information or services that you have requested.

This Site is not intended or designed to attract children under the age of 18. We do not knowingly collect personal data via this Site from visitors in that age group without the explicit consent of a parent or guardian.

Data integrity

Winterbrook limits the collection and processing of personal data to what is necessary to fulfil the intended purpose of requesting such data. We shall take reasonable steps to ensure that any personal data collected is accurate, complete, and current.

Consent

We hereby notify you that we propose to collect and use your personal data in accordance with this Privacy Statement when you seek to register for a Winterbrook service. You may discontinue our use of your personal data if you later decide that you no longer want us to (also known as "opting out" or "unsubscribing"). If we wish to use this information for purposes other than those for which the data was initially collected, we will obtain your consent. We will also offer a means to opt out of receiving any further such communications.

Collection of Anonymous Computer Information

When you visit the Site, we do not collect any personal data about you without your permission. However, we do collect anonymous information about you if your computer is set to allow that type of collection. This type of information allows us to monitor traffic on the Site, evaluate customer interest and perform other market research activities, such as surveying browsing habits on our sites, including the Site. This may include the following anonymous information:

- **Use of IP addresses**

An Internet Protocol (IP) address is a set of numbers that is automatically assigned to your computer whenever you log on to your internet service provider or through your organisation's local area network (LAN) or wide area network (WAN). Web servers automatically identify your computer by the IP address assigned to it during your session online.

Winterbrook, or third party companies acting on behalf of Winterbrook, may collect IP addresses for the purposes of systems administration and analyse the use of the Site. We also may use IP addresses to identify users of the Site when we feel it is necessary to enforce compliance with the Site's terms of use, or to protect our services, the Site or other users.

- **Cookies**

Winterbrook uses cookies on this Site to allow us to analyse its use and improve the experience for visitors to the Site. Cookies are tiny files, composed of a string of letters and numbers, placed on your computer by web page servers.

Use of Your Personal Data

We will use your personal data in the following ways: to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us; to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about; and to provide you, or permit selected third parties to provide you, with information about services we feel may interest you.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form or registration form); to notify you about changes to our goods or service; and to ensure that content from our site is presented in the most effective manner for you and for your computer/device.

Sharing Your Information with Third Parties.

Winterbrook will not share your personal data with third parties who are not associated entities (such as members of our group of companies – for which, see below) for their own use unless we have obtained your consent to do so. When you provide personal data to Winterbrook, it will be accessible to some of Winterbrook's business partners, such as companies we retain to fulfil requests for information or provide assistance on specific programs or projects. Winterbrook requires third parties to whom it discloses personal data to protect personal data using substantially similar standards to those required by Winterbrook. We also require that these third parties not use your personal data for any use that is not specifically authorised by Winterbrook.

There may also be instances in which Winterbrook is required to share your information with third parties who have not been retained by us (directly or indirectly), such as if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of a criminal or other legal investigation or proceeding. Furthermore, in the event that Winterbrook sells or buys any business assets or if Winterbrook or substantially all of its assets are acquired by a third party, we may disclose your personal data to the prospective seller or purchaser. Entities receiving personal data under these conditions typically have privacy requirements that apply to their handling of your information.

Personal data collected from you may also be transferred to a third party in the event that the business of the Site and the customer data connected with it is sold, assigned or transferred. In the event that such sale, assignment or transfer should occur, Winterbrook would require the buyer, assignee or transferee to treat your information in accordance with this Privacy Statement.

Sharing Information with Other Winterbrook Companies or Affiliates.

The personal data that you provide to Winterbrook may be shared with other companies within the Winterbrook group of companies. This may mean that your personal data may be transferred to Winterbrook affiliates at, and stored at, a destination outside the European Economic Area (the "EEA"). By submitting your personal data, you agree to this transfer, storing or processing. Other Winterbrook companies or affiliates that may receive your personal data will abide by substantially similar privacy requirements relating to your personal data. Other Winterbrook companies to whom we provide your personal data may use your personal data in the same way as we may. We strive to protect personal data entrusted to us no matter what country the information is stored in or transferred to, and have appropriate procedures in place to help ensure the security of your personal data.

Security of Your Information.

We use appropriate technical, administrative and physical safeguards to protect data that you provide to us from loss, misuse or alteration. Despite these safeguards, it is not possible to guarantee the absolute security of personal data. Internet transmissions, particularly email transmissions, are never 100% secure or error-free. We also caution you to guard your own computer and password against unauthorised access or use by others.

Links to Other Sites.

This Privacy Statement applies only to the Site and not to third party web sites. The Site may contain links or references to other web sites maintained by third parties over which Winterbrook has no control. Similarly, the Site may be accessed via third party links or web sites over which Winterbrook has no control. While we aim to ensure that such web sites are of a high standard, we cannot guarantee the privacy standards of web sites to which we link. This Privacy Statement is not intended to be applicable to any linked, non-Winterbrook owned or operated site. **Please ensure that you check the legal and privacy statement posted on each website you link to before entering any personal data.**

Updating and Accessing Information.

We encourage you to update all information that you provide to us to ensure that such information is accurate and current (e.g., updating your mailing address if you move). This will help us continue to provide information that best meets your needs. The Data Protection Act 1998 gives you the right to access information held about you. Your right of access to your personal data can be exercised in accordance with that Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. You can also exercise the right at any time by contacting us at the address given below. All requests to update or access your information will be subject to verification of the identity of the requesting individual, to help protect your data from unauthorised access or alteration by third parties. Winterbrook complies with laws and regulations applicable to the right to amend your data in our files.

Updates to Winterbrook Privacy Statement.

Winterbrook may update this Privacy Statement from time to time. If the changes are material, we may post a notice on the Site but we may not always update you. We encourage you to review our

Privacy Statement periodically so that you aware of any changes. Your continued use of the Site constitutes your agreement to the Privacy Statement and any updates.

How to Contact Us.

If you have any questions about our Privacy Statement, please write to us at 88 Crawford Street, London W1H 2EJ.

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