

PRIVACY & COOKIE POLICY

Last revised: 2022.10.11

1. GENERAL

This Privacy & Cookie Policy sets out how the Joint Data Controllers (defined below) collect, store, use, and share your personal information.

The commercialcardclaim.co.uk domain (the “**Website**”) is owned by Harcus Parker Limited (“**Harcus Parker**”), as instructed by the two class representatives in the claims: (i) Commercial and Interregional Card Claims I Limited and (ii) Commercial and Interregional Card Claims II Limited. The client registration form on the Website was designed, and is operated, by Angeion Group International.

For the purposes of the EU General Data Protection Regulation (Regulation 2016/679) and any relevant national data protection legislation, the joint data controllers are:

- Harcus Parker Limited, with company number 11352441 and whose registered address is Melbourne House, 44-46 Aldwych, London, England, WC2B 4LL. Harcus Parker may be contacted using the contact details below (**Contact Us**);
- Commercial and Interregional Card Claims I Limited, with company number 13548489 and whose registered address is 7th Floor, Melbourne House, 44-46 Aldwych, London, England, WC2B 4LL;
- Commercial and Interregional Card Claims II Limited, with company number 13548511 and whose registered address is 7th Floor, Melbourne House, 44-46 Aldwych, London, England, WC2B 4LL; and
- Angeion Group International with UK establishment number BR022433 and whose registered office is at Angeion Group International C/O Steve Weisbrot, 22 Eastcheap, 1st Floor, EC3M 1EU (“**Angeion**”),

(together, the “**Joint Data Controllers**”, “**we**”, “**us**”, “**our**”).

References to “**you**” or “**your**” in this Privacy & Cookie Policy mean the natural person representing the business whose personal data is being collected.

This Privacy & Cookie Policy applies to personal information that is collected and processed:

- By **Angeion** via the [Website](https://commercialcardclaim.co.uk/) (desktop and mobile version) designed to inform the public and potential class members about the proposed collective actions as described on the **Website**; and
- By **Harcus Parker** via other interactions including phone or online or offline correspondence (**Other Interactions**).

We refer to the Website and Other Interactions as collectively, the “**Services**”.

We may update this Privacy & Cookie Policy, in our sole discretion, to reflect changes to the Joint Data Controllers’ information practices. If we do this and the changes are material, we will post a notice that we have made changes to this Privacy & Cookie Policy for a reasonable period before we implement those changes, and we will indicate, at the top of the Privacy & Cookie Policy, the date these terms were last revised. Any revisions to this Privacy & Cookie Policy will take effect on the date stated in the notice.

By using the Services, you acknowledge and consent to the collection, use and sharing

of your personal information as set forth in the relevant sections of this Privacy & Cookie Policy.

You also acknowledge that by providing your personal information through the Website your personal information is transferred to and accessed by Angeion's personnel in the United States. If you do not wish for your personal information to be used in the manner set out in this Privacy & Cookie Policy or transferred to the United States, you should not access or use the Services.

2. CONTACT US & ACCOUNTABILITY

If you have any questions about this Privacy & Cookie Policy or our privacy practices, please contact Marcus Parker at: commercialcardclaim.co.uk or by emailing commercialcardclaim@harcusparker.co.uk with the words "Privacy & Cookie Policy" in the subject line.

3. INFORMATION WE COLLECT

We may collect, use, store and transfer different kinds of personal information about you, from third parties, which we summarise below:

- **Contact data**, including full name, email address, telephone number and business name.
- **Communications data**, for example any information which you choose to provide to us when you communicate with us.
- **Other data**, such as banking and financial information as well as publicly available information about you, related parties, and other related information concerning your claim(s).

Angeion, as the entity that operates the Website's claim registration form, may collect, use, store and transfer your **device and technical data**, such as your browser type, operating system, and your IP address (a unique address that identifies your computer on the Internet), the full URL clickstream (i.e., where you have come from on the internet and where you go to, and the date and time of such activities) of when you enter our Website.

Angeion also collects, uses and shares aggregated or anonymised data such as statistical or demographic data for any purpose. Aggregated or anonymised data could be derived from your personal information but is not considered personal information in law as this data will not directly or indirectly reveal your identity. If Angeion combines or connects aggregated data with your personal information so that it can directly or indirectly identify you, Angeion will treat the combined data as personal information which will be used in accordance with this Privacy & Cookie Policy.

Angeion does not collect any sensitive personal information about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

4. How Your Information is Collected

Your information is collected:

- (a) Directly from you (for example, when you complete the client registration form on the Website); and
- (b) Through direct interactions (phone or online or offline correspondence) between you and Marcus Parker (for example, as you interact with and use the Services).

5. HOW YOUR INFORMATION IS USED

Your personal information is used only in accordance with the law. Your personal information is used for the following purposes:

- To provide the Services.
- To respond to your enquiries.
- To send you transactional and administrative messages related to the Services.
- To keep the Services safe and secure.
- To comply with our legal/regulatory obligations and protect our legal/commercial interests.
- To improve the Services.
- For any other purpose notified to you within the Services.

We rely on the following legal grounds for processing your personal information:

Processing Purpose	Legal Basis to Process your Personal Information
<i>To provide the Services</i>	Our legitimate interest in providing the Services and facilitating settlement management and administration relating to cases and/or claims in which you may be interested according to the terms and conditions of orders and/or agreements approved by the courts.
<i>To respond to your enquiries</i>	Our legitimate interests in providing high quality customer service and responding to enquiries posed to us.
<i>To send you transactional and administrative communications related to the Services</i>	To comply with a legal or regulatory obligation, and/or our legitimate interests in efficiently fulfilling our legal and contractual duties (including in jurisdictions other than that in which you reside), keeping you informed about important Website updates (such as scheduled maintenance or security updates), and providing high quality customer service.
<i>To keep the Services safe and secure</i>	To comply with a legal or regulatory obligation and/or our legitimate interests in ensuring the security of the Services, preventing fraud, including to verify your identity if so required.
<i>To comply with our legal/judicial/regulatory obligations and protect our legal/commercial interests</i>	To comply with a legal or regulatory obligation and/or our legitimate interests in efficiently fulfilling our legal and contractual duties (including in jurisdictions other than that in which you reside), protecting our corporate image and brand, managing legal risk, and complying with regulations that apply to us. Additionally, in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
<i>To improve the Services</i>	Our legitimate interests in providing high quality and efficient services. To the extent this involves storing information on your device such as cookies or other similar

	web technologies, your consent.
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6. **WEB TECHNOLOGIES**

On the Website, information is collected using “cookies”. Cookies are small data files stored on the hard drive of your device. The Website may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them) to provide you with a more personal and interactive experience on our Services. The Website uses first-party cookies, served directly by Angeion to your device.

You can find more information about cookies and how to manage them at www.allaboutcookies.org.

The Website may use the following types of cookies for the purposes set out below:

Type of Cookie	Purpose
<i>Essential Cookies</i>	These cookies are essential to make the Website operational.
<i>Functionality Cookies</i>	These cookies allow the Website to remember choices you make when you provide your personal information on the client registration form. The purpose of these cookies is to provide you with a more personalised experience and to avoid you from having to re-select your preferences every time you use the client registration form.

You can typically remove or reject cookies via your browser settings. To do this, follow the instructions provided in your browser (usually located within the “settings,” “help,” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

If you do not accept our cookies, you may experience some inconvenience in your use of the Website.

7. **SHARING INFORMATION**

We share your personal information only when it is necessary to offer the Services, legally required, or permitted by you. We share personal information with third parties as follows:

- **Service providers:** We may share personal information to third party service providers. For example, Angeion uses Amazon Web Services as a hosting provider. Angeion uses third parties such as this to act as data processors. Such third parties have access to personal information for a limited purpose and limited period of time and Angeion implements contractual protections limiting the use of that personal information to the provision of services to Angeion.
- **In connection with business transfers:** If Angeion sells, transfers or merges parts of its business or its assets, Angeion may share information with the purchaser of that business/those assets. Alternatively, Angeion may seek to acquire other businesses or merge with them.
- **In connection with compliance with laws and the protection of our rights and the rights of others:** We will be required to access and disclose personal information in response to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. Additionally, we will access and share account or other personal information when we believe it is necessary to comply with law, to protect our interests

or property, to prevent fraud or other illegal activity perpetrated through the Services, or to prevent imminent harm. This will include accessing and sharing personal information with other companies, professional advisors (such as lawyers, auditors and insurers), agents or government agencies, or law enforcement authorities.

We may share information about you that has been aggregated or anonymised such that it cannot reasonably be used to identify you in any way for any lawful business purpose.

8. RETAINING INFORMATION, LIMITING USE, AND DISCLOSURE

Your personal information will be retained only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying legal, accounting, or reporting requirements.

In some circumstances your personal information may be anonymised (so that it can no longer be associated with you) in which case this information may be used indefinitely without further notice to you.

Personal information will not be used or disclosed for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.

We will destroy, erase, or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for a legal or business purpose. Due care will be taken when destroying personal information so as to prevent unauthorised access to the information.

9. SECURING INFORMATION

Angeion has implemented technical and organisational measures to protect the confidentiality, integrity and availability of your personal information. Specifically, Angeion has implemented measures designed to secure personal information from accidental loss and from unauthorised access, use, alteration, and disclosure. All personal information is stored on secure servers behind firewalls.

Angeion's security measures include:

- Education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data.
- Administrative and technical controls to restrict access to personal data on a 'need to know' basis.
- Technological security measures, including firewalls, VPNs, multi-factor authentication, encryption, and anti-virus software.
- Physical security measures, such as staff security passes to access our premises.
- Commercially reasonable precautions for the disposal or destruction of personal information that may consist of securely shredding physical documents and deleting electronically stored information in a manner that prevents it from being readily recovered.

Harcus Parker, similarly, has implemented technical and organisational measures to protect the confidentiality, integrity and availability of any personal information you share directly with it.

10. INTERNATIONAL (CROSS BORDER) TRANSFERS

Your information shall be stored on servers located in the United Kingdom.

However, Angeion and any of its subsidiaries or affiliated companies may transfer your personal information across national borders to fulfil any of the above purposes, including, but not limited, to the United States.

Where service providers or other third parties are based outside the European Economic Area receive personal information, data transfers shall be in accordance with commercial best practices compliant with applicable data privacy laws and regulations of the originating jurisdiction.

11. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION; YOUR RIGHTS

We will comply with any rights provided to you under applicable law. You have the following rights in relation to the personal information we hold about you, unless provided otherwise by relevant national legislation:

- Right to request access to your personal information.
- Right to request correction of your personal information.
- Right to request erasure of your personal information.
- Right to object to processing of your personal information.
- Right to request restriction of processing your personal information.
- Right to request transfer of your personal information.
- Right to withdraw consent (where we rely on your consent as our basis for processing).

Please note that some of these rights are not absolute and we may refuse a request to exercise particular rights, but we will keep you informed as to the actions that we can take when you make your request. We try to respond to all legitimate requests within one month, although we will notify you if it takes longer. Additionally, you may be required to verify your identity when making such requests.

You have the right to make a complaint at any time to your supervisory authority for data protection issues, which for the UK is the Information Commissioner's Office (<https://ico.org.uk/>). If you need further assistance regarding your rights, please contact Harcus Parker using the contact details above (Contact Us).

12. CHILDREN

Our Services are not intended for or directed to children under the age of 18. If you are a parent or guardian and become aware that your child has provided us with personal information without your consent, please contact Harcus Parker using the contact details above (Contact Us). Where we collect, use and store the information of UK or EEA individuals below the age of 18, and we need to rely on consent as a legal basis for processing your information or the relevant country requires consent from a parent, we may require a parent's consent before we collect and/or use that information.

13. THIRD PARTY LINKS

The Website may contain links to other websites. We are not responsible for the privacy practices of other websites. We encourage users to read the privacy statements of other websites that collect personal information. This Privacy and Cookie Policy applies only to information collected by Angeion and Harcus Parker via the Services.