



23 May 18



WEBSITE PRIVACY POLICY



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1. Introduction

ASE 5 Limited (“**CEG**”, “**we**”, “**us**” or “**our**”) are committed to the protection and security of your personal data. This Privacy Policy explains how we will collect, process, use or share any personal data we collect from you, or that you provide to us when you use this website [<http://theoctagoncolchester.com/>] (the “**Website**”).

CEG is the controller of your personal data via our Website pursuant to the EU General Protection Regulation 2016/679.

Please read this Privacy Policy to understand how we may process your personal data provided via our Website.

By visiting our Website, you are acknowledging the terms of this Privacy Policy. Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites.

2. How do we collect information from you?

Communications via our Website: We collect personal data when you provide it to us through communications via our Website. This includes where you have contacted us through the channels listed on the Website and situations in which you have chosen to provide the information to us, including, for example, for recruitment purposes.

3. Purposes for processing your personal data

We process any personal data you provide to us to enable us to perform a contract we are about to enter into or have entered into with you, to ensure compliance with local legal and regulatory requirements and for the purposes of our legitimate business interests, including:

- a) to enable us to carry out our obligations arising from any contracts and to provide you with the information, products and services that you request from us;
- b) to enable us to respond to an enquiry or other request you make when you contact us via our Website;
- c) to comply with our legal obligations, standards, policies and procedures;
- d) to notify you about changes to our service;
- e) to enable us to issue a notice or corrective action to you in relation to any of our services, if required;
- f) to better understand how you interact with our Website, including its functionality and features, and ensure that content is presented in the most effective; and

4. Sharing your information

We may share your personal data with:

- a) our affiliated companies;
- b) Government bodies and agencies in the UK and overseas to comply with our legal and regulatory obligations;
- c) a prospective seller or buyer in the event of a sale or purchase of any CEG business or asset so that the buyer can continue to provide you with information and services;
- d) our service providers that we engage to provide services for us. Where we provide your personal data to third party services providers, they are required to keep your personal



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data confidential and secure, and must only use your personal data as instructed by us; and

- e) our distributors, business partners, or other service providers, including for marketing purposes or where you have chosen to share your personal data through various features and functionality provided via our Website.

We may also disclose your personal data where required to respond to authorised requests from government authorities or where required by law. Where we are required by law, we may also disclose your personal data where it is necessary to enforce or apply this Privacy Policy or other agreements, to investigate or protect the rights, property or safety of CEG and our group companies, our products and services and our customers, distributors or business partners or to prevent or take action regarding illegal activities or fraud, situations involving potential threats to the safety of any person or as evidence in litigation.

5. How do we use cookies?

For more information on how CEG uses cookies, please refer to our Cookies Policy, available here: [<http://theoctagoncolchester.com/policies/cookie-policy.pdf>].

6. Storing your personal data

Your personal data collected via our Website will be stored on servers located in the UK. It may also be processed by CEG staff or by one of our service providers operation.

We have implemented appropriate safeguards, to protect your personal data when it is transferred outside the European Economic Area (“EEA”), including the execution of data transfer agreements with recipients of the information. For access to copies of these agreements please contact Grace Lewis by email at grace.lewis@ceg.co.uk or by mail at Sloane Square House, 1 Holbein Place, London SW1W 8NS. We will process any request in line with any local laws and our policies and procedures.

7. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

8. Your rights

You may inform us of any changes in your personal data, and in accordance with our obligations under applicable data protection laws, we will update or delete your personal data accordingly.

If you are located in the EEA, you may have the right to: (a) request access to personal data we hold about you; (b) request we correct any inaccurate personal data we hold about you; (c) request we delete any personal data we hold about you; (d) restrict the processing of personal data we hold about you; (e) object to the processing of personal data we hold about you; and/or (f) where we process your personal data to fulfil a contract between us, receive any personal



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data we hold about you in a structured and commonly used machine-readable format or have such personal information transmitted to another company.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing information requested to you.

To exercise any of your rights in connection with your personal data, please contact us by email at grace.lewis@ceg.co.uk or by mail at Sloane Square House, 1 Holbein Place, London SW1W 8NS. We will process any request in line with any local laws and our policies and procedures. If you are located in the EEA, you have the right to lodge a complaint about how we process your personal data with the supervisory authority in your country.

9. Changes to this Privacy Policy

Any changes to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Privacy Policy.

10. How you can contact us

If you have any questions about the processing of personal data via this Website, please contact us by email at: grace.lewis@ceg.co.uk. If you contact us, we will do our utmost best to address any concerns you may have about our processing of your personal data.