

**Last Updated: April 2018**

## **PRIVACY NOTICE**

This privacy notice describes how Aqueous Management Limited handles personal information collected through [www.aqueousuw.com](http://www.aqueousuw.com) and other websites controlled by Aqueous Management Limited that link to this privacy notice. If you do not agree to this privacy notice, you should cease using this website and you should not provide your personal information to us.

### **1. SCOPE OF THIS PRIVACY NOTICE**

This privacy notice only applies to [www.aqueousuw.com](http://www.aqueousuw.com) and any other website of Aqueous Management Limited where a link to this privacy notice is provided (the “**Websites**”).

Websites and specific web pages linked from [www.aqueousuw.com](http://www.aqueousuw.com) may be subject to separate terms of use (including separate privacy notices). You must not provide Personal Information if you do not accept such terms of use.

Where links from our Websites are provided to non-Aqueous Management Limited websites, Aqueous Management Limited is not responsible for those websites. The inclusion of a link to a third-party website does not imply endorsement of the linked site or service by us or our affiliates. These third-party websites will be governed by different terms of use (including privacy notices) and you are solely responsible for viewing and using each such website in accordance with the applicable terms of use. Aqueous Management Limited is not responsible for how your Personal Information is handled by such third-party websites.

### **2. CROSS-BORDER TRANSFER**

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Websites you acknowledge that we may transfer information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. We have established safeguards to protect Personal Information that is transferred to other countries, including appropriate contractual protections. For more information on the appropriate safeguards in place, please contact us using the details below.

### **3. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual. Personal Information we may collect through our Websites includes:

- your name, postal address, email address, phone number, occupation and other contact information;
- information regarding your dealings with us;
- any interest you have in relation to our services or our practice areas;
- any information you may voluntarily submit to us by completing any form on our Websites; and

- details of your visits to and usage of our Website.

We may collect Personal Information in various ways:

- from any form you may complete and submit through our Websites, for example information collected from the “Contact Us” page of our Websites;
- from the content of surveys that you may complete on our Websites;
- from session ‘cookies’ and other similar tools deployed on parts of our Websites that can only be accessed by authenticated users who are logged into the Website (for further information regarding cookies used on our Websites, please see Section 6 below);
- when you provide information as a client in connection with us providing professional services to you. Such information may be collected through [www.aqueousuw.com](http://www.aqueousuw.com) when clients access Aqueous Management Limited client links within this Website. Access will be subject to the terms of business we have with clients and any additional terms and conditions of use attached to those sites; and
- from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected) and from other third parties.

#### 4. LEGAL BASES FOR PROCESSING PERSONAL INFORMATION

We process Personal Information for our legitimate business interests (outlined in section 5 below), to perform contracts that you may have with us (for example if you use client services accessed through the Websites) and to comply with our legal obligations.

Where applicable laws require that we obtain your consent to collect and process your Personal Information, we will obtain your consent accordingly. When we obtain your consent, EU law (where it applies) gives you the right to withdraw your consent. You can do this at any time by contacting us using the details at the end of this privacy notice.

In some jurisdictions, your use of the Websites may be taken as implied consent to the collection and processing of Personal Information as outlined in this privacy notice.

#### 5. HOW WE MAY USE YOUR PERSONAL INFORMATION

We may use Personal Information about you for our legitimate business interests, including the following:

- to facilitate your participation in interactive features you may choose to use on our Websites and personalize your experience on the Websites by presenting content tailored to you;
- to correspond with you, notify you of events or changes to our service, or otherwise to fulfill your requests and respond to your queries and requests for information, which may include marketing to you (subject to applicable laws);
- for the purposes of providing professional services to you via Aqueous Management Limited applications; such services will be subject to additional terms and conditions of use including privacy; and

- for data analysis, audits, fraud monitoring and prevention, and developing new products, enhancing, improving or modifying our Websites, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

Aqueous Management Limited will keep your information confidential, but may disclose your Personal Information in the following circumstances:

- to its affiliates who provide support and assistance in delivering core services to clients;
- to third party service providers such as entities providing customer service, email delivery, auditing, hosting our website and other services;
- in order to enforce or apply our Website terms of use, or to protect the rights, privacy, safety or property of Aqueous Management Limited, our clients, affiliates or other parties;
- to any courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence, if we are subject to a request for assistance or if we are under a legal obligation to disclose your Personal Information;
- in accordance with the separate terms and conditions of use that may attach to Aqueous Management Limited website links.

## 7. OTHER INFORMATION WE MAY COLLECT

“**Other Information**” is any information about Website users that does not directly identify an individual. Where Other Information is capable of being used indirectly or combined with other information to identify an individual, we treat Other Information in the same way as Personal Information under this privacy notice.

Aqueous Management Limited may collect Other Information in various ways.

For instance, when you visit our Websites, our server may record your IP address. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Websites. We may also derive your approximate location and company details from your IP address. Aqueous Management Limited may also gather Other Information such as the type of your internet browser, your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, and the name and version of the Websites you are using, which Aqueous Management Limited uses to provide you with a more effective service.

**Cookies:** Additionally, when you visit our Websites, Aqueous Management Limited may store a ‘cookie’ on the hard drive of your computer. Cookies are small text files that a website transfers to your hard drive to store and sometimes collect information about your usage of websites, such as time spent on the Websites, pages visited, language preferences, and other anonymous traffic data. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while using the Websites and to recognize your computer in order to assist your use of the Websites. We also gather statistical information about use of the Websites in order to continually improve their

design and functionality, understand how they are used and assist us with resolving questions regarding them.

You can control the way in which cookies are used by altering your browser settings. You may refuse to accept cookies by activating the setting on your browser that allows you to reject cookies. However, if you select such a setting, this may affect the functioning of our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access or log on to our Websites. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). For more information about the use of cookies on our Websites and your choices regarding the placement of cookies, please see our [Cookie Notice](#).

**Google Analytics:** Our Websites use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Websites and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and you can opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

**Do Not Track signals:** Please note that our Websites do not recognize or respond to any signal which your browser might transmit through the so-called 'Do Not Track' feature your browser might have. Enabling such feature on your browser will not necessarily affect the way in which our Websites operate, and if you wish to disable cookies on our Websites, you should not rely on any 'Do Not Track' feature your browser might have.

**Pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Websites to, among other things, track the actions of users of the Websites (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Websites and response rates.

**From you:** Information such as your preferred means of communication is collected when you voluntarily provide it.

## 8. AGGREGATED DATA

We may aggregate data about Website users or analytical purposes. Aggregated data is not capable of being used to identify individuals and is not treated as Personal Information under this privacy notice.

## 9. SECURITY

Aqueous Management Limited maintains appropriate technical and organizational security measures to protect the security of your data against loss, misuse, unauthorized access, disclosure or alteration. Despite this, the security of the transmission of information via the Internet cannot always be guaranteed and you acknowledge this in your access and use of our Websites. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "*Contact & Comments*" section below.

## 10. CHOICES AND ACCESS

You may opt out from receiving marketing-related communications from us on a going-forward basis by contacting us or by using the unsubscribe mechanism contained in each email. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

If you would like to review, correct, update, suppress, or restrict the processing of your Personal Information or request a copy of Personal Information about you, you may contact us by sending us an email at [dataaccessrequest@aqueousuw.com](mailto:dataaccessrequest@aqueousuw.com) or sending your request by postal mail to the address provided in the “Contact & Comments” section below.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

## 11. RETENTION PERIOD

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this privacy notice unless a longer retention period is required or permitted by law.

## 12. USE OF WEBSITES BY MINORS

The Websites are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Information through the Websites.

## 13. SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive Personal Information (*e.g.*, national identification numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Websites.

## 14. CHANGES TO OUR PRIVACY NOTICE

From time to time, we may change our privacy notice. The effective date of this privacy notice, as indicated at the beginning of this privacy notice, indicates the last time this privacy notice was revised. Checking this effective date allows you to determine whether there have

been changes since the last time you reviewed the notice. We will notify you of changes to this privacy notice by posting the revised privacy notice on our Websites.

## 15. CONTACT & COMMENTS

If you have any questions or comments regarding this privacy notice, please contact our Business Controls Manager, at 34 Lime Street, London EC3M 7AT or at [privacy@aqueousuw.com](mailto:privacy@aqueousuw.com). You have the right to provide a comment or lodge a complaint with a supervisory authority regarding this privacy notice.