

# Privacy Policy

Version: *updated as of 25 May 2018*

We (Galileo Capital Management Ltd (to include the trading brand LGBT Capital), Galileo Media & Finance Ltd, and Galileo Consulting Ltd) process Personal Data both as a Processor and as a Controller, as defined in the Directive of 1995 (the “Directive”) and the GDPR of 25 May 2018 (“GDPR”).

We respect your privacy and have developed this Privacy Policy to demonstrate our efforts to protect your privacy. This Privacy Policy describes the information we collect, how that information may be used, with whom it may be shared, and your choices about such uses and disclosures. We encourage you to read this Privacy Policy carefully when visiting our web-based interfaces or contacting us. By using our webpages or contacting us, you are accepting the practices described in this Privacy Policy.

This Privacy Policy sets out your Privacy Rights, to include:

- ✓ How we may collect information about you;
- ✓ What information we may collect about you;
- ✓ What we use that information for;
- ✓ With whom we may share such information;
- ✓ What are your rights with regard to your personal data we hold and process; and
- ✓ How to access your data, request and make changes and how to delete it.

This Privacy Policy applies where we act as a data controller with respect to the personal data of our website visitors, as we determine the purposes and further processing of such data.

We may use cookies on our webpages. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

If you have any questions about our privacy practices, please see below for information on how to contact us.

## **Why we collect Information**

Collecting information allows us to service your requests and keep track of how you personally prefer to be contacted so we know how to communicate and how not to communicate with you.

## **How we collect Information**

We collect and process data about your use of our webpages and social media platforms. Such usage data may include your IP address, geographical location, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your webpage usage. Such usage data is collated by our web analytics system and Google Analytics and such usage data may be processed for us to better

# Privacy Policy

understand and improve the user experience when visiting our webpages and/or submitting specific information or service requests.

When you visit our webpages, we may assign your device one or more cookies to facilitate access to our webpages and to personalize your experience. Through the use of a cookie, we also may automatically collect information about your activity on our webpages, such as the pages you visit, the time and date of your visits and the links you click.

We may allow service providers, advertising companies and ad networks, and other third parties to display advertisements on our webpages. Such companies may use tracking technologies, such as cookies or web beacons, to collect information about users who view or interact with their advertisements. We do not share with third parties any personal information that has not been rendered anonymous prior to such possible sharing. Some of these third-party advertising companies may be advertising networks that may feature in services such as [Your Online Choices](#), which offers a single location to opt out of ad targeting from member companies. Opting out will not decrease the number of advertisements you see.

We collect and process your personal information, which may include your name, phone number, geographical location and email address, whether collected via email or other web-based correspondence (including social media interaction), or phone or in-person conversations. This personal data may be processed for the purposes of us servicing specific requests made by you for information or services. We may collect and process information contained in any request or enquiry you submit to us, and such data may be processed for the purposes of sending relevant information and/or possible services to you.

In addition to the specific purposes for which we may process your personal data set out above, we may also process your personal data where such processing is necessary for compliance with a legal obligation.

By submitting a request or enquiry to us, you give consent for us to use any such data to service your request and/or enquiry.

## How we use the Information we collect

We may use information that we collect about you to:

- ✓ Deliver and improve our products and services, and manage our business;
- ✓ Respond to your requests for information and/or services;
- ✓ Perform research and analysis about your use of our content, webpage designs, and services;
- ✓ Communicate with you by email, postal mail, telephone and/or mobile devices about information or services that may be of interest to you, either from us or from third parties;

# Privacy Policy

- ✓ Develop, display, and track content and advertising tailored to your interests, including providing our advertisements to you when you visit other sites;
- ✓ Website analytics;
- ✓ Enforce or exercise any rights.

## With whom we may share Your Information

We do not share your personal information with third parties except when you submit to us a specific request the delivery of which requires for such data to be shared with a third party. Such third parties may then be granted access to personal information needed to perform their functions but are not permitted to share or use such information for any unrelated purposes.

We may have to share your personal information in response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

We may share your personal information in connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

We may use and share non-personal information and may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated, non-personal information, or personal information in hashed, non-human readable form, with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis or other business purposes. To opt-out of cookies that may be set by third-party data or advertising partners, please go to <http://www.aboutads.info/choices/>

## Your Information – How to Access

You have the right to request access to the data we hold on you. You can do this by contacting [info@galileo-cm.com](mailto:info@galileo-cm.com) and we will then make sure to provide you with a copy of the data we hold on file about you. In order to comply with your request, we may ask you to verify your identity. We fulfil requests by sending you a copy electrically.

## Your Information - Correction and Deletion

If you believe that the information we hold about you is incorrect, you are welcome to contact us so we can update it and keep your data accurate.

Our standard practice is to only hold your data for as long as it is required. This will vary depending on the activity for which the data is being used.

# Privacy Policy

However, we are wholly aware of our obligations under the Data Protection Act and the GDPR, and we make every effort to ensure that we only hold on to your data for as long as it is required.

Because data is such a key part of helping us to achieve our objectives, we have set out the following retention policy: when your data has been communicated to us by you as part of a request for information and/or service, we will retain your information indefinitely unless explicitly requested otherwise by you.

If at any point you wish for us to delete your information, you can contact us at [info@galileo-cm.com](mailto:info@galileo-cm.com). Please note that information that we might be required to keep for legal reasons will not be deleted.

It is your right to ask that your information be erased from our records whenever you wish, but please be aware that when we do, we will lose all of your preferences, including possible requests to opt out from certain types of communications.

## “Do Not Track” Disclosure

Do Not Track ("DNT") is a privacy preference that users can set in their web browsers, to inform websites that they do not want certain information about their webpage visits collected. We are committed to providing you with meaningful choices about the information we collect and that is why we provide the opt-out links above. However, we do not recognise or respond to any DNT signals, as the Internet industry works toward defining exactly what DNT means, what it means to comply with DNT, and a common approach to responding to DNT.

## Third-Party Websites

There are places on our webpages and social media platforms where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an advertisement on our Service, you may be taken to a website that we do not control. These third-party websites may independently solicit and collect information from you, including personal information, and in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit.

## How we protect Your Information

We take security measures to help safeguard your personal information from unauthorised access and disclosure. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information would always remain secure.

# Privacy Policy

All data we collect is held in secure hosting facilities located within the European Economic Area (the “EEA”).

We have an appointed Data Protection Officer who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at [info@galileo-cm.com](mailto:info@galileo-cm.com).

## Visiting from outside the EEA

If you are visiting our Service from outside the EEA, please be aware that your information may be transferred to, stored, and processed in the EEA where our servers are located and our central database is operated. By visiting our webpages and social media platforms, you understand and agree that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

## No Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of our webpages or social media platforms.

## Changes to this Privacy Policy

We may update this Privacy Policy from time to time. When we post changes to this Privacy Policy, we will revise the "last updated" date at the top of this Privacy Policy. We recommend that you check from time to time to inform yourself of any changes in this Privacy Policy.