

## WARHORSE PARTNERS SERVICES LIMITED

### PRIVACY POLICY

(LAST UPDATED APRIL 2026)

Warhorse Partners Services Limited (**Warhorse, we, us**) is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

#### Important information and who we are

##### Purpose of this privacy notice

This privacy policy gives you information about how Warhorse collects and processes your personal data. It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

##### Controller

Warhorse is the data controller and responsible for your personal data.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please use the contact details set out below:

Full name of legal entity: *Warhorse Partners Services Limited*

Email address: *michelle.thorpe@warhorsepartners.com*

Postal address: *12-18 Theobalds Road, London WC1X 8SL*

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, therefore please contact us in the first instance.

##### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

##### Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### 1. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

You may provide us with personal data in several ways, including by filling in forms on our website, by subscribing to our email newsletter, corresponding with us by phone or by email or by interacting with us through social media. This includes (but is not limited to) information you provide when you register for an account, enter into a contract for the supply of services or report problems with our services. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Transaction Data** includes details about payments from you and other details of services you have

purchased from us.

- **Technical Data** includes internet protocol (*IP*) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes information about services purchased by you.
- **Usage Data** includes information about how you interact with and use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

We do not collect any Special Categories of Personal Data about you (this includes 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). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (e.g. to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **2. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- Your interactions with us. You may give us your personal data by filling in online forms, subscribing to our email newsletter or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:
  - contract with us for the supply of services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - interact with our social media accounts;
  - visit our website and navigate around the web pages; or
  - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy in clause 5 below for further details.
- We also collect Technical Data from third-party analytics providers and Technical, Identity and Contact Data from third-party data aggregators.

## **3. How we use your personal data**

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

### Purposes for which we will use your personal data

We have set out below, in table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Use	Type of data	Legal basis
To onboard you as a client or supplier and set up our contractual relationship	(a) Identity (b) Contact	Performance of a contract with you e.g. where processing is necessary to provide the services you requested
To provide our marketing and related services to you including analytics and reporting	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate services (to operate and improve our services)
To process and deliver our services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you where processing is necessary to provide the services you requested (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you where processing is necessary to provide the services you requested (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To administer and protect our business and this website (including troubleshooting,	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network

data analysis, testing, system maintenance, support, reporting and hosting of data)		security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

#### **Promotional offers from us**

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or have received services from us and, in each case, you have not opted out of receiving that marketing.

#### **Third-party marketing**

We will get your express consent before we share your personal data with any third party outside Warhorse for their own direct marketing purposes.

#### **Opting out of marketing**

You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message sent to you by us or by contacting us at any time.

Where you opt out of receiving marketing messages from us, this will not apply to personal data provided to us as a result of providing a service to you or other transactions.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. These essential cookies are always enabled because our website won't work properly without them. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. You can switch off these cookies in your browser settings but you may then not be able to access all or parts of our website.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title Cookie Name	Purpose	More information
Google Analytics 4 (GA4) _ga _ga_[container-id]	<p>These are analytical and functionality cookies and enable us to:</p> <p>(a) Estimate our audience size and understand how our website it used.</p> <p>(b) Store information about your browsing preferences and so allow us to customise our site and to provide you with offers that are targeted to your individual interests.</p> <p>(c) Speed up your searches.</p> <p>(d) Recognise you when you return to our site.</p> <p>(e) Allow you to use our site in a way that makes your browsing experience more convenient. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.</p> <p>Google Analytics cookies will remain on your device for up to 2 years (depending on configuration).</p>	<p>Google's privacy policy is available at: <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>.</p>
YouTube, SoundCloud, Vimeo	<p>These are functionality cookies and enable enhanced features such as embedded video and audio content hosted by third-party providers (including YouTube, Vimeo and SoundCloud). When this content is accessed, those providers may set cookies and process personal data.</p>	<p><a href="https://www.youtube.com/howyoutubeworks/privacy/">https://www.youtube.com/howyoutubeworks/privacy/</a></p> <p><a href="https://soundcloud.com/pages/privacy">https://soundcloud.com/pages/privacy</a></p> <p><a href="https://vimeo.com/legal/privacy/policy?msocid=114416c2b9cf65e6213c0072b86a64f3">https://vimeo.com/legal/privacy/policy?msocid=114416c2b9cf65e6213c0072b86a64f3</a></p>
Webflow cookies	<p>Webflow sets strictly necessary cookies required for website security, session management and load balancing. These cookies ensure that pages load correctly and protect the website against malicious activity.</p>	<p>Webflow's privacy policy is available at: <a href="https://webflow.com/legal/privacy?msocid=114416c2b9cf65e6213c0072b">https://webflow.com/legal/privacy?msocid=114416c2b9cf65e6213c0072b</a></p>

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As per the above table, we embed content from named third parties into our website. Please note that these third parties may also set cookies via our website, over which we have no control. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies. To deactivate the use of third party advertising cookies, you may visit the relevant consumer page to manage the use of these types of cookies as set out in the table.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

### Choices about cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>(Internet Explorer);
- <https://support.apple.com/en-gb/guide/safari/sfri11471/mac> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

You can choose which analytical, functionality and targeting cookies we can set by clicking on the button(s):

Strictly necessary/essential cookies **ALWAYS ACTIVE**  
 Analytical or performance cookies (including Google Analytics) **OFF**  
 Functionality cookies (including YouTube, SoundCloud, Vimeo) **OFF**

You can also choose to "Reject All" cookies in the cookie banner.

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Cookie duration varies depending on the type of cookie and the provider. Some cookies are session-based and expire when you close your browser. Others are persistent cookies and remain on your device for a defined period set by the provider. Further details about specific cookie durations can be obtained from the relevant third-party provider's cookie policy. If you have any questions or concerns about our use of cookies, please contact us.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table "Purposes for which we will use your personal data" above.

- External Third Parties including providers of IT and system administration services, website hosting, analytics, payment processing, customer support and professional advisory services such as lawyers,

accountants, auditors, insurers, and consultants, who provide legal, financial, compliance, or professional advice to us.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International transfers**

We may use certain service providers that require the transfer of your personal data outside the UK. Whenever we transfer your personal data outside the UK, we ensure a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may rely on UK-approved standard contractual clauses or other appropriate safeguards to ensure your personal data receives the same level of protection as it does in the UK. Please contact us if you want further information on the information on the specific mechanism used by us when transferring your personal data out of the UK.

### **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **4. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, 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 data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **5. Your legal rights**

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to processing of your personal data
- Request restriction of processing your personal data.
- Request the transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.