

Please carefully read all of this Privacy Policy (the 'Policy'), together with our 'Terms' and any other documents referred to on it, as these documents set out the basis on which any personal data we collect from you, or that you provide to us, will be processed and used by us.

Who We Are

This website is owned and operated by St James's Limited, a company registered in England and Wales with Company Number 14455927 and whose registered office is at: 167 - 169 Great Portland Street, London, W1W 5PF.

PRIVACY POLICY

Introduction

1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.

1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

2. How we use your personal data

2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and
- (d) the legal bases of the processing.

2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

2.3 We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.4 We may process your information included in your personal profile on our website ("profile data"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the

purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.5 We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may include both company and personal information. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.6 We may process information that you post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.7 We may process information contained in any enquiry you submit to us regarding products and/or services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.

2.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

2.10 We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.11 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.13 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Automated decision-making

3.1 We will use your personal data for the purposes of automated decision-making in

relation to our website and our marketing & sales processes.

3.2 This automated decision-making will involve marketing personalisation across our website and other marketing communications such as email.

3.3 The significance and possible consequences of this automated decision-making are that you are likely to receive a personalised experience with content and other marketing assets.

4. Providing your personal data to others

4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

4.3 We may disclose personal data to our suppliers or subcontractors insofar as reasonably necessary for them to complete any services / sales activity we have set out for them on our behalf.

4.5 We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

5.2 We and our other group companies have offices and facilities in The United Kingdom. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

5.3 The hosting facilities for our website are situated in the United Kingdom, Germany and United States of America. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

5.4 All of our marketing and sales subcontractors are situated in the United Kingdom. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by

appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

5.5 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6.1 Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 Your personal data will be retained for three years following the date and time of your last interaction with our website or business, at the end of which period it will be deleted from our systems.

6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of personal data will be determined based on your interaction with our website or business.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Security of personal data

7.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

7.2 We will store all your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.

7.3 The following personal data will be stored by us in encrypted form: your name, contact information, password(s) and cardholder data.

7.4 Data relating to your enquiries and financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

7.5 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

7.6 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when

you log in to our website).

8. Amendments

8.1 We may update this policy from time to time by publishing a new version on our website.

8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

8.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

Your rights

9.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

(a) the payment of a fee (currently fixed at GBP 10); and

(b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

9.2 We may withhold personal information that you request to the extent permitted by law.

9.3 You may instruct us at any time not to process your personal information for marketing purposes.

9.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

9.5 In this Section 9, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

9.6 Your principal rights under data protection law are:

(a) the right to access;

(b) the right to rectification;

(c) the right to erasure;

(d) the right to restrict processing;

(e) the right to object to processing;

(f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

9.7 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

9.8 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

9.9 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

9.10 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

9.11 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

9.12 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

9.13 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

9.14 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of

others.

9.15 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

9.16 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

9.17 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 9.

Third party websites

10.1 From time to time Our website may include hyperlinks to, and details of, third party websites.

10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

Personal data of children

11.1 Our website and services are targeted at persons over the age of 18 years. We do not knowingly collect data from persons under the age of 18 years.

11.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

Updating information

12.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

Acting as a data processor

13.1 In respect of payment data we do not act as a data controller; instead, we act as a data processor.

13.2 Insofar as we act as a data processor rather than a data controller, this policy shall not apply. Our legal obligations as a data processor are instead set out in the contract between us and the relevant data controller.

ABOUT COOKIES

14.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

14.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

14.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

15.1 We use cookies for the following purposes:

(a) authentication: we use cookies to identify you when you visit our website and as you navigate our website;

(b) status: we use cookies to help us to determine if you are logged into our website;

(d) personalisation: we use cookies to store information about your preferences and to personalise our website for you;

(e) security: we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;

(f) advertising: we use cookies to help us to display advertisements that will be relevant to you;

(g) analysis: we use cookies to help us to analyse the use and performance of our website and services and

(h) cookie consent: we use cookies to store your preferences in relation to the use of cookies more generally.

Cookies used by our service providers

16.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

16.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/> (This link opens in a new tab)..

16.3 We use HubSpot to report on and manage website activity This service uses cookies for tracking activity across our site. You can view the privacy policy of this service provider at <https://legal.hubspot.com/privacy-policy> (This link opens in a new tab)..

Managing Cookies

17.1 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:

(a) <https://support.google.com/chrome/answer/95647?hl=en> (This link opens in a new tab). (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

(This link opens in a new tab). (Firefox);

(c) <http://www.opera.com/help/tutorials/security/cookies/> (This link opens in a new tab). (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (This link opens in a new tab). (Internet Explorer);

(e) <https://support.apple.com/kb/PH21411> (This link opens in a new tab). (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

17.2 Blocking all cookies will have a negative impact upon the usability of many websites.

17.3 If you block cookies, you will not be able to use all the features on our website.

Our details

18.1 This website is owned and operated by PINX Limited.

18.2 We are registered in England and Wales under registration number 14455927, and our registered office is at 167 - 169 Great Portland Street, London, W1W 5PF.

18.3 You can contact us in English at: support@pinx.co.uk

(a) writing to us in English using our website contact form at; www.pinx.co.uk/contact

(b) by telephone, on the contact number published on our website from time to time.

Data Protection Officer

Our data protection officer's contact details are: support@pinx.co.uk

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