

Privacy and Cookies Policy

Onward Opportunities Limited (“we”, “us”, “our” or the “Company”) is committed to protecting the privacy of third parties (including its clients and all visitors to the website onwardopportunities.co.uk (the “Website”). Please read the following Privacy and Cookies Policy which explains how we use and protect your information.

We will only use information from which you can be identified (“Personal Information”) provided to us, or otherwise obtained by us, as set out in this Policy. We endeavour to ensure that your Personal Information is handled in accordance with “Data Protection Legislation”. References to “Data Protection Legislation” in this Policy mean any law applicable from time to time relating to the processing of personal data and/or privacy, as in force as at the date of this policy, or as re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation, and to the extent applicable, the UK Data Protection Act 2018, the UK GDPR, the Data Protection (Guernsey) Law, 2017, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and the GDPR. ‘GDPR’ means the General Data Protection Regulation (Regulation (EU) 2016/679), and ‘UK GDPR’ means the UK GDPR (as defined in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019/419), in each case including any legally binding regulations, directions, and orders issued from time to time under or in connection with the relevant legislation, and as applied and amended from time to time.

By visiting and/or contacting us through the Website (or otherwise engaging with us), you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy. The Company reserves the right to change this Policy from time to time and you should therefore check this page frequently to ensure that you are happy with any changes.

In this Policy, the “Company”, “we”, “us” and “our”, refer to the Company, registered in Guernsey with registered office at 3rd Floor, 1 Le Truchot, St Peter Port, Guernsey, GY1 1WD. Our company registration number is 71526

For the purposes of Data Protection Legislation, we are deemed to be the “data controller” in respect of any Personal Information that you provide to us or we otherwise obtain about you.

This Privacy and Cookie Policy covers:

1. Personal Information that we collect from you via this Website
2. Personal Information that we receive from other sources
3. What we do with such Personal Information
4. How we share such Personal Information
5. Our security and data retention measures, and any transfers we make outside of the EEA
6. How you can access and update your Personal Information
7. Complaints
8. Our use of cookies
9. Changes to this Policy
10. Our contact information



1. PERSONAL INFORMATION THAT WE COLLECT FROM YOU

When you engage with us (e.g. by visiting or making an enquiry through the Website), you may provide Personal Information about yourself including your name and contact details (e.g. your address, email address and telephone number). Where you make use of our Website we may also collect information about your use of the Website (e.g. your IP address and choice of web browser).

Some of this Personal Information is collected and processed so we can answer your enquiry, some for the purpose of legal compliance and some for the purposes of our legitimate business interests (namely to carry out and improve our business, analyse the use of our Website and services and support visitors to the Website).

2. PERSONAL INFORMATION THAT WE RECEIVE FROM OTHER SOURCES

We may receive information from third parties who collect Personal Information from you and pass it on to us. Where this is the case the third party is responsible for obtaining the relevant consents from you to ensure you are happy with the ways in which your Personal Information will be used.

3. WHAT WE DO WITH YOUR PERSONAL INFORMATION

We will only use your Personal Information in order to (a) supply the investment services or information you have requested and correspond with you, (b) provide support to you in respect of these services, (c) improve our Website and services, and (d) for our internal business processes.

Where you have explicitly consented at the time we collected your Personal Information or where we otherwise have a right to do so, we may also use your Personal Information to let you know about our products and services, by post, telephone and e-mail.

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting us at hello@dowgate.co.uk. You may also opt out of receiving marketing emails from us by following the instructions outlined in the email.

4. HOW WE SHARE YOUR PERSONAL INFORMATION

Where it is necessary to answer your enquiry or for our internal business processes, we may share your Personal Information with certain third parties such as our administrator(s). By submitting your Personal Information to us, you agree to such third parties processing your information. The Company asks all third parties to treat your data securely and in accordance with this Privacy Policy, and will take reasonable steps to enforce this.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as AML obligations), or protect the rights, property, or safety of the Company and our contractors,



clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

We will also share your contact details with third party partners in the event that you have consented to receive marketing from such third parties. If you change your mind about being contacted by these parties in the future, please let us know by contacting us using the details set out at section 10 below or contact the third party directly. You may also opt out of receiving any marketing communications from third parties by following the instructions outlined in these communications.

5. OUR SECURITY AND DATA RETENTION MEASURES, AND ANY TRANSFERS WE MAKE OUTSIDE OF THE EEA

The Personal Information you provide to us will be transferred to and stored on our servers in the UK and we take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as Data Protection Legislation allows.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the Website; any transmission is therefore at your own risk.

In processing your Personal Information, it may be necessary for us to transfer your Personal Information outside a Regulated State. It may also be accessed by staff operating outside a Regulated State who work for us or for one of our suppliers. This includes staff engaged in, among other things, the provision of support services to the Company or the Website. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside a Regulated State. This means that we will only transfer your Personal Information to third parties outside a Regulated State if that third party (a) is situated in a country that has been confirmed by the European Commission or (in the case of data transfers to which UK GDPR is applicable), the UK Government, to provide adequate protection to Personal Information, or (b) has agreed (by way of written contract) to provide all protections to your Personal Information as required by Data Protection Legislation. References to 'Regulated State' in this Policy mean a country which is a member state of the European Economic Area or the United Kingdom, as the case may be.

6. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

You have the right to ask us not to process your Personal Information for marketing or research purposes. We will usually inform you (before collecting your Personal Information) if we intend to use your Personal Information for such purposes or if we intend to disclose your Personal Information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at the details set out at section 10 below.



You have the right to see the Personal Information we hold about you and to ask us to: (a) make any changes to ensure that any Personal Information we hold about you is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal ground for us to hold it; or (c) transfer any information we hold about you to a specified third party. If you wish to do this, please contact us using the contact details set out at section 10 below.

7. COMPLAINTS

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us using the details set out at section 10 below. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

Our Website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

8. OUR USE OF COOKIES

A cookie is a small file that, if you consent to it, is sent to your browser from our web server and is stored on your computer. Cookies help us to analyse web traffic and identify which pages of our Website are being used. Our Website also uses cookies to respond to you as an individual so that it can tailor its operations to your needs by gathering and remembering information about your preferences. We only use this information for statistical analysis purposes and then the data is removed from our systems.

A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Website and the data you choose to share with us (including data you automatically share with us by way of your browser settings).

In particular, we use the following cookies:

(a) Strictly necessary cookies. These are cookies that are required for the operation of our Website.

(b) Analytical/performance cookies. These cookies collect information about how visitors use our Website, for instance which pages visitors go to most often, and if they get error messages from web pages. Information collected by these cookies is aggregated and therefore anonymous. It is only used to improve how the Website works.

You will normally see a message on our Website before we store a cookie on your computer which describes the types of cookies we use and what information they might collect. We may also use banners and pop-ups from time to time to give you options around cookies use.

You can also manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies). Note, however, that if you block all cookies (including essential cookies) via your browser settings you may not be able to access all or parts of our Website.



You can also find more information about cookies generally here: www.allaboutcookies.org

Please note that third party providers may also use cookies to assess the ways in which you make use of their websites and we have no control over these.

9. CHANGES TO OUR PRIVACY AND COOKIES POLICY

The Company may amend this Policy at any time without notice. By continuing to use the Website and making use of our services you agree to the updated Policy. If you do not agree to any changes that we make, you should not use or access (or continue to use or access) the Website and/or our services. Any changes to this Policy will be posted on the Website.

10. OUR CONTACT INFORMATION

If you have any questions (including relating to transfers of your Personal Information outside the UK or the EEA (as the case may be), please feel free to contact us by email at: hello@dowgate.co.uk.