

BASEMENT CROWD LIMITED

PRIVACY POLICY

Last updated: 24 September 2019

1. About this Privacy Policy

- 1.1 This website, www.basementcrowd.com (the **Site**) is operated by Basement Crowd Limited, a company incorporated in England and Wales with company number 08838261. Our registered office is at Lower Ground Floor, 17-21 Emerald Street, London, England WC1N 3QN (**Basement Crowd, our, us or we**).
- 1.2 We are committed to protecting your privacy. We comply with the principles set out in the General Data Protection Regulation (2016/679) and other applicable national privacy legislation (**Data Protection Legislation**).
- 1.3 The aim of this privacy policy (**Policy**) is to tell you how we will use any personal information collected from and about users of this Site and those who communicate with us (**you, your**). Please read it carefully before you proceed.
- 1.4 We may modify this Policy from time to time. We will use reasonable endeavours to notify you of any material amendments to this Policy by placing a clear notice about them on this Site or by other means. Please review this Policy whenever you use this Site as any changes apply from the date that we make them.
- 1.5 You may communicate with us via the Site or by other means. These communications may include your personal information as set out in this Policy at paragraph 2. If you would like further information about this Policy you can contact us on the details provided in paragraph 9.

2. What information do we collect?

- 2.1 We collect, store and use information contained in or relating to communications that you send to us through this Site or by other means (including the content and metadata associated with the communication).
- 2.2 Where the information you provide relates to someone else, you must tell them how we will use their information in accordance with this Policy.

3. How will we use your personal information?

- 3.1 We will use your personal information for the following purposes:
 - 3.1.1 to respond to requests you make through the Site or in separate communications with us;
 - 3.1.2 to administer and improve this Site and our products and services;
 - 3.1.3 for internal research and development purposes and to improve and test the features and functions of the Site;

- 3.1.4 to investigate and respond to any queries or complaints about this Site, us or our business;
- 3.1.5 where relevant, to establish, exercise or defend legal claims;
- 3.1.6 to protect the rights, property, or safety of us, our business, our clients or others;
- 3.1.7 to detect, investigate or prevent security or cyber incidents;
- 3.1.8 to monitor and analyse the use of any account to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime; and
- 3.1.9 to meet applicable legal, regulatory and compliance requirements.

4. Sharing your personal information

- 4.1 When we share your personal information, we do so in accordance with Data Protection Legislation.
- 4.2 We share personal information with our 100% parent company, Silcrow Labs Limited, a company registered in England and Wales with company number 10596143 whose registered office is a Lower Ground Floor, 17-21 Emerald Street, London WC1N 3QN.
- 4.3 We employ the services of third parties to help us in certain areas, such as software development, data hosting and email services. We will share your personal data with one or more of these third parties for the purposes set out in paragraph 3.
- 4.4 We will share your personal information with government authorities and other third parties when compelled to do so by government and law enforcement authorities or as otherwise required or permitted by law, including but not limited to in response to court orders. We may also disclose personal information when we have reason to believe that someone is causing injury to or interference with our rights or property, other users or anyone else that could be harmed by such activities. We also cooperate with law enforcement inquiries and other third parties to enforce laws, intellectual property rights and other rights.
- 4.5 In the event that our business is sold or integrated with another business, your personal information may be disclosed to our advisers, a prospective purchaser and any prospective purchaser's advisers and will be passed to the new owners of the business.

5. Use of cookies and similar technologies

We do not use cookies or similar technologies to collect information about you or your usage of the Site.

6. Third party links

This Site contains links to other Sites over which we have no control. We are not responsible for and do not review or endorse the privacy policies or practices of other Sites which you choose to access from this Site. We encourage you to review the privacy policies of those other Sites so you can understand how they collect, use and share your personal information.

7. Security

We have implemented appropriate technical and organisational measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration and disclosure. However, the internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal information for improper purposes.

8. Updating your information

You may review, correct, update or change your personal information at any time by contacting us as set out in paragraph 9 below.

9. How to contact us

If you have any questions about this Policy or your personal information, please contact us at info@basementcrowd.com or on +44 (0)20 3912 9993.

10. Additional information for the EEA

In order to meet applicable data protection and privacy law in the European Economic Area (EEA), we provide certain additional information below.

11. Who is responsible for your personal data?

Basement Crowd will be the data controller for the personal information collected through, and in relation to, our Site. Our contact details are set out at paragraph 9 above.

12. Lawful basis for processing

12.1 We have documented the lawful bases for our processing in Annex 2.

12.2 On some occasions, we process your personal information on the basis of your consent. On other occasions, we process your data when we are required to do this by law (for example, if we are required by court order or any applicable law to process data).

12.3 We also process your personal information when it is in our, or a third party's, legitimate interests to do so, provided that your data protection rights do not override these interests. Where we are not relying legal requirements, we process your personal information for the legitimate interests as described in this Policy.

12.4 Annex 1 summarises the lawful bases pursuant to which we may process your personal data in accordance with applicable Data Protection Legislation. For each type of processing described in paragraph 3 of this Privacy Policy, Annex 2 identifies the relevant lawful basis or bases for such processing.

13. International data transfers

We will transfer your personal information to our service providers as identified above in paragraph 4.3, which will in some cases involve the transfer of personal information to countries outside the EEA which have different data protection standards to those which apply in the EEA, for the purposes set out in this Policy. We will put in place European Commission

approved standard contractual clauses to protect this data or will rely upon another appropriate safeguard, such as a relevant Privacy Shield (eg, the EU-US Privacy Shield). You have a right to ask us for a copy of the safeguard (by contacting us as set out in paragraph 9 above).

14. How long will we keep your personal information?

- 14.1 We will only keep your information for as long as is necessary for the purposes in paragraph 3.
- 14.2 You can request that we remove your information from our systems by contacting us via the contact details in paragraph 9. If you request that we remove your information from our systems, we will endeavour to do so within 48 hours.

15. Your rights

- 15.1 We respect your rights to access and control your information and will respond to requests in accordance with Data Protection Legislation. We may ask you to verify your identity and to provide other details to help us to respond to your request.
- 15.2 Depending on the lawful basis for processing upon which we rely, you have a right to:
 - 15.2.1 request access to your personal information;
 - 15.2.2 request that we correct or complete personal information that is inaccurate or incomplete;
 - 15.2.3 request that we erase your personal information, which we will do where required by Data Protection Legislation;
 - 15.2.4 restrict our processing of your personal information, in certain circumstances;
 - 15.2.5 request that we provide you with copies of your personal information in a machine-readable format or transfer it across different services;
 - 15.2.6 object to certain types of processing, including where we process your personal information on the basis of our legitimate interests and for direct marketing purposes; and
 - 15.2.7 where we have asked for your consent to process your data, to withdraw this consent.
- 15.3 If you wish to exercise these rights, please contact us using the contact details in paragraph 9 above. We hope that we can satisfy any queries you may have about the way we process your data. However, if you have unresolved concerns you also have the right to complain to data protection authorities.

Annex 1

Summary of the lawful bases for processing under Article 6 of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)

Lawful basis	Description
Consent	You have given consent to the processing of your personal data for one or more specific purposes.
Contract	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
Legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
Vital interests	Processing is necessary in order to protect the vital interests of you or another natural person.
Public task	Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
Legitimate interests	Processing is necessary for the purposes of legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

Annex 2

Lawful bases for processing under this Privacy Policy

Para.	Type of and purpose of processing	Lawful basis for processing
3.1.1	Respond to requests you make through the Site or in separate communications with us.	<ul style="list-style-type: none"> • Legitimate interest in facilitating users' interaction with the Site or us.
3.1.2	Administer and improve this Site and our products and services.	<ul style="list-style-type: none"> • Legitimate interest in administering and improving the Site and our products and services for the benefit of users.
3.1.3	Internal research and development purposes and to improve and test the features and functions of our products and services.	<ul style="list-style-type: none"> • Legitimate interest in administering and improving the Site and our products and services for the benefit of users.
3.1.5	Establish, exercise or defend legal claims.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in the protection of personal rights, property and safety.
3.1.6	Protect the rights, property, or safety of us, our business, our clients or others.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in the protection of personal rights, property and safety.
3.1.7	Detect, investigate or prevent security or cyber incidents.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in detecting, investigating or preventing security or cyber incidents.
3.1.8	Monitor and analyse the use of the Site to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime.	<ul style="list-style-type: none"> • Legitimate interest in preventing and investigating fraud, misrepresentation, security incidents and crime to protect (a) users of the Site, and (b) our directors, employees and consultants.
3.1.9	Meet applicable legal, regulatory and compliance requirements.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in ensuring compliance with applicable UK and overseas laws and regulations.

Note: where more than one lawful basis for processing is identified above, depending on the circumstances (a) all such lawful bases may apply, or (b) one or more (but not all) of the lawful bases may apply.