

## PRIVACY POLICY

At Drake Star Partners Limited (“**Drake Star**” or “**firm**”), we are committed to protecting and respecting your privacy. This Privacy and Cookies policy (together with our **Terms & Conditions** and any other documents referred to in it) set out the basis on which any personal data we collect from you, or that you provide to us is processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This privacy notice explains how Drake Star processes your personal data and your relationship with us in accordance with applicable data privacy laws, the Data Protection Act 1998, and the General Data Protection Regulation (“**GDPR**”) in Europe. We update this Privacy Policy notice from time to time and suggest that you review this Policy periodically to take notice of any changes we made.

### 1. Definitions

The person responsible within the meaning of the General Data Protection Act 1998, the General Data Protection Regulation (EU) 2016/679 (GDPR), other data protection laws in the Member States of the European Union, and other provisions of a data protection character is:

Susan Sharpe  
Drake Star  
16 Berkeley Street  
W1J 8DZ  
United Kingdom  
Phone: +44 20 7112 7777  
Email: [contact@drakestar.com](mailto:contact@drakestar.com)

### 2. Information we may collect from you

Drake Star processes your personal information to meet our legal, statutory, and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

You are not required to provide any personal information to access our website. We may, however, collect and process the following data from you:

- Name
- Telephone number
- Email address that you provide should you choose to subscribe to our newsletter via our website
- Office address
- Information that you provide when you submit an application for a position on our website’s “Careers” page
- If you contact us, we may keep a record of that correspondence
- We may also ask you for information when you report a problem with our website
- Information contained in business cards you have given us

We collect information in the below ways:

- Meeting notes
- Information you have shared with us
- Published data
- Business cards you have given us
- CVs and/or application letters
- Cookies (please refer to this notice's Cookies section)

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

Drake Star takes your privacy very seriously and will never disclose, share, or sell your data without your consent unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice.

The purposes and reasons for processing your organizational or personal data are detailed below:

- To enable us to communicate with you to provide market insights and industry information that we believe will be of interest to you (i.e. Newsletter)
- To enable us to communicate with you effectively and efficiently at any point whilst you are a potential employee
- To enable us to communicate with you effectively and efficiently at any point whilst you are applying for a job
- To enable us to communicate with you to inform you about our projects
- To enable us to operate our website smoothly and efficiently to give you a good user experience
- To enable us to effectively use Google Analytics, MailChimp, Splash, and Eventbrite

### **4. Newsletter**

You receive newsletters from Drake Star as you have consented to receiving this kind of information, are in business relations with Drake Star, and/or have expressed interest in receiving news updates from our firm.

Our Business to Business (“B2B”) communications will always fall under the following 5 categories: 1) deal announcement; 2) corporate announcement; 3) events; 4) research papers; 5) sector/market news and updates.

At Drake Star Partners, we take your privacy seriously and will only process your email address to send timely newsletters that are relevant to your line of business. The contents of this newsletter are informative in nature and are never meant to be considered as solicitation, offer, recommendation, or advice.

Your email address is collected and processed either because you chose to subscribe to our newsletter via our website or following a meeting with one of Drake Star's employees and/or when this member of the Drake Star team explicitly asked for your permission to add your email address to our distribution list.

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

You are free to opt-out or object at any point in time by clicking the “unsubscribe” link, which can be found below every email newsletter, or by contacting us. There will be no charges for doing so other than the cost of transmitting the opt-out or objection at your provider’s base rates. Should you have any questions about this notice, wish to ask us what data we may hold on you, wish to change/restrict/delete any of your data we may hold in our systems (Customer Relationship Management “CRM”, email marketing, email distribution lists, etc.), please contact us at: [contact@drakestar.com](mailto:contact@drakestar.com).

## **5. Your rights**

You have the right to access any personal information that Drake Star processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use. You have the right of appeal to a supervisory authority if the personal data are not collected from the data subject.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

## **6. Sharing and disclosing your personal information**

We do not share or disclosure any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Drake Star uses third parties to provide a range of services and business functions, however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws, and any other appropriate confidentiality and security measures.

Further to the above, the purposes and reasons for sharing your organizational or personal data, and the recipients are detailed below:

- To enable us to share relevant personal information such as your application within our company consisting of different legal entities in the US, Europe and Asia
- Under exceptional circumstances, for example, if you have registered to one of our company events, we share your personal data with our event partners
- We use Amazon Web Services for hosting our website and Egnyte Connect as our cloud solution

Please write to us at [contact@drakestar.com](mailto:contact@drakestar.com) to obtain a full list of suppliers and their privacy policies.

## **7. Safeguarding measures**

At Drake Star, we work hard to protect you and your information from unauthorized access, alteration, disclosure, or destruction and have several layers of security measures in place, including, but not limited to:

- Mandatory encryption and security training for all staff members
- Limited and siloed access to critical and confidential data
- Encryption of data at rest and in transit wherever practicably possible
- Extensive malware and Virus scanning and protection
- Security awareness training
- Firewalls, AntiVirus, and Email Gateway Security

## **8. How long we keep your data**

Drake Star only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We regularly review changes in the organizational data we hold and have processes enabling us to delete invalid data regularly.

## **9. Cookies**

Cookies are small text files that are downloaded to your device by websites you visit.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of a website. Cookies make the interaction between you and the website faster and easier.

Cookies may be set by the website you are visiting (local cookies) or they may be set by other websites that run content on the page you are viewing (third-party cookies).

Drake Star only uses a limited number of local and third-party cookies. Local ones include Cloudflare to identify trusted traffic and third-party ones include Google Analytics cookies, which are enabled to pull through data for anonymized analysis.

At Drake Star, we only use cookies that are essential to the operation of our website, but we do not use any user data in any way.

You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your browser. Please note that removal of cookies may affect your use and experience of our website.

## 10. Legal basis of processing

Art. 6 I lit. a GDPR and other applicable data protection laws serve our company as the legal basis for processing operations where we obtain consent for a particular processing purpose. If the processing of personal data is necessary to fulfill a contract of which the data subject is a party, as is the case, for example, in processing operations necessary for the supply of goods or the provision of any other service or consideration, processing shall be based on Art. 6 I lit. b GDPR. The same applies to processing operations that are necessary to carry out pre-contractual measures, for example in cases of inquiries regarding our products or services. If our company is subject to a legal obligation which requires the processing of personal data, such as the fulfillment of tax obligations, the processing is based on Art. 6 I lit. c GDPR. In rare cases, the processing of personal data may be required to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor to our premises were injured and his or her name, age, health insurance, or other vital information would have to be passed on to a doctor, hospital, or other third parties. Then the processing would be based on Art. 6 I lit. d GDPR are based. On this legal basis, processing operations that are not covered by any of the above legal bases are required if processing is necessary to safeguard the legitimate interests of our company or a third party, unless the interests, fundamental rights and fundamental freedoms of the person concerned prevail. Such processing operations are particularly allowed to us because they have been specifically mentioned by the European legislator. In that regard, it is considered that a legitimate interest could be assumed if the data subject is a customer of the controller (recital 47, second sentence, GDPR).

## 11. Further Information / Complaints

If you have any concerns or require any further information or wish to lodge a complaint, please do not hesitate to contact us at:

Susan Sharpe  
Drake Star  
16 Berkeley Street  
W1J 8DZ  
Phone: +44 20 7112 7777  
Email: [contact@drakestar.com](mailto:contact@drakestar.com)

Drake Star takes your privacy seriously and will only process any personal data we may hold with your consent and in accordance with the terms stated in our Privacy Policy.