

BREED REPLY LIMITED PRIVACY POLICY

Breed Reply Limited ("**We**" or "**Breed Reply**") and its associated companies are committed to protecting and respecting your privacy.

This policy (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. "Personal data" for these purposes is information which relates to an identified or identifiable living individual. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

CONTROLLER

Breed Reply is part of the Reply Group, which is made up of different legal entities. This privacy policy is issued on behalf of Breed Reply, which is the data controller in respect of the personal data we collect and is responsible for the websites www.breedreply.com or www.reply.com/breed-reply/en (the "**Breed Reply Website**") This Privacy Policy applies to the Breed Reply Website only (for the privacy policies relating to Reply's or the other Reply Group Companies' websites, please visit www.reply.com).

HOW IS YOUR PERSONAL DATA COLLECTED?

Data you give us: You may give us information about you by filling in forms on the Breed Reply Website or uploading content through the Breed Reply Website such as video, pdf, or any other format or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the Breed Reply Website, subscribe for newsletters or other marketing communications or if you report a problem with the Website as well as if you apply for funding and services to support business growth.

Data we collect: 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 [here](#) for further details.

Data we receive from other sources: We are also working closely with the Reply Group (as defined below) and third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

THE DATA WE COLLECT ABOUT YOU

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, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes mailing address, email address and telephone numbers.
- **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, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, preferences, feedback and survey responses.
 - **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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. This website is not intended for children and we do not knowingly collect data relating to children.

Where you have applied for funding, we may also collect non-personal data on your business such as financial information, business plans, business ideas and such other information as we may reasonably request in an application for our services ("**Your Business Data**"). In some instances, personal data may be included within Your Business Data (for example a slide within a pitch deck on management, including names, titles and contact details).

HOW WE USE YOUR PERSONAL DATA AND THE LEGAL BASES FOR DOING SO

Depending on the circumstances, we may use your personal data in the following ways:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a potential investee company	(a) Identity (b) Contact (c) Your Business Data	Necessary for our legitimate interests (to keep a record of your application)
To carry out an initial evaluation of your application for funding and in relation to services we may provide to you	(a) Identity (b) Contact (c) Your Business Data	Necessary for our legitimate interests (to assess suitability for funding and services)
To manage our relationship with you which will include: (a) Notifying you of the outcome of any application (b) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To conduct know you customer checks and other due diligence (in the event that your application is approved in principle by our investment committee)	(a) Identity (b) Contact (c) Your Business Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to fully diligence whether your business is suitable for funding and our services)
To administer our investments and provide our services (in the event that your application is successful and funding is	(a) Identity (b) Contact (c) Your Business	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

granted) and notify you of any changes to the services	Data	(c) Necessary for our legitimate interests (to provide our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network 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 and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(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 products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you (including other Reply Group Companies)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

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DISCLOSURE OF YOUR INFORMATION

We may share your information (including your personal data and Your Business Data) with other Reply Group Companies, in particular to evaluate your application for funding and assess whether any other Reply Group Company may be able to support your business. You can access Reply S.p.A's privacy policy [here](#).

We may also share your personal data with selected third parties including:

- our professional advisors, in order to conduct due diligence and prepare suitable legal documentation in the event your application for funding is progressed;
- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you (including third party “know your customer” search providers);
- suppliers of IT services (such as those needed to operate this website or analytic or search engine providers) and third parties engaged by us for the purpose of providing marketing communications or services requested by you;
- in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets and their respective professional advisers; and
- government and regulatory authorities, for example to respond to a legal request or comply with a legal obligation.

We may also disclose Your Business Data to investors and potential investors in companies in which you are or may be involved. In the event that you do not already have a relationship with such investors, we would normally seek your consent prior to such disclosure, in particular when Your Business Data includes personal data.

STORAGE AND TRANSFERS OF DATA

Your personal data is kept for as long as it is necessary for the purposes for which it was collected. For applications for funding, this period shall not exceed 6 years from the date of application or, in the event funding is provided, 6 years from termination of our investment documentation. Therefore, after this period data is destroyed, erased or anonymised. In order to provide our services and the website, any personal data that we obtain may be transferred to and stored by a third party at a locality inside or outside the UK or the European Economic Area (EEA), including in a country where the law provides less protection for personal data. If we transfer personal data to a third party outside of the UK or EEA, we will, as required by applicable law, ensure that your privacy rights are protected by appropriate safeguards to ensure that your data is treated securely and in accordance with this privacy policy. In particular, appropriate data protection is provided by an agreement

entered into by us containing the model clauses which permit such transfer. You can find a link to the model clauses at https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en. Please contact us if you would like more information about these safeguards.

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.

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.

THIRD PARTY SITES

The Website may, from time to time, contain links to and from the websites of our partner networks and affiliates. 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 policies. Please check these policies before you submit any personal data to these websites.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a

legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT US

If you have any questions, comments or concerns regarding this privacy policy or about how we have used your personal data, please do contact us via email at info@breedreply.com or in writing to:

Breed Reply Limited (Company No. 09074975)
38 Grosvenor Gardens
London SW1W 0EB

Alternatively, you may contact the Data Protection Office for the Reply Group in the UK, in writing to Richard Veryard, 38 Grosvenor Gardens London SW1W 0EB

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

Last updated: 21 May 2018

Breed Reply is a member of the Reply Group and for the purposes of this Privacy Policy, "Reply Group" shall mean our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (each a "Reply Group Company").