

AB&Co.

# Privacy policy

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# 1. Introduction

1.1 This privacy policy sets out how personal data is collected, used, stored, disclosed, and otherwise processed in connection with the activities of Aaran Beattie & Co.

1.2 This policy applies to all personal data processed by the firm, whether obtained directly or indirectly, and whether processed through websites, digital platforms, communications, systems, tools, client portals, or any other means associated with the firm's operations.

1.3 This policy applies to any individual whose personal data is processed by the firm, including, without limitation, website visitors, prospective clients, current and former clients, professional contacts, counterparties, suppliers, employees, contractors, candidates, and any other individuals who engage with the firm in any capacity.

1.4 The purpose of this policy is to provide a clear and lawful explanation of how personal data is handled, the principles governing that handling, and the rights available to individuals under applicable data protection law. It is not intended to replicate contractual terms, confidentiality obligations, or engagement-specific provisions, which may apply separately.

1.5 This policy is drafted to comply with applicable data protection legislation in force in the United Kingdom, including the United Kingdom General Data Protection Regulation, the Data Protection Act 2018, and related legislation, and is intended to operate alongside any other lawful notices or disclosures provided by the firm from time to time.

1.6 Where the firm provides additional or more specific privacy information in particular contexts, such information supplements this policy and does not displace it unless expressly stated.

1.7 By accessing the firm's websites, communicating with the firm, entering into an engagement, or otherwise interacting with the firm in a manner that involves the processing of personal data, you acknowledge that your personal data will be processed in accordance with this policy.

1.8 This policy does not form part of any contract of employment, engagement, or service, and does not create contractual rights beyond those required by applicable law.

## 2. Scope of this privacy policy

2.1 This privacy policy governs the processing of personal data by Aaran Beattie & Co. across all aspects of its activities, whether conducted online, offline, or through any combination of channels, systems, or communications.

2.2 This policy applies to all websites, domains, applications, platforms, tools, client portals, communication systems, and digital or technical infrastructure operated by, on behalf of, or in association with the firm, whether existing at the date of publication or introduced in the future.

2.3 This policy applies irrespective of the manner in which personal data is collected or processed, including through direct interactions, automated or semi-automated systems, written or oral communications, third-party platforms, or internal records and analyses.

2.4 This policy applies to personal data processed in connection with advisory services, business development, operational administration, employment and engagement arrangements, regulatory and legal compliance, security and risk management, and any ancillary or supporting activities undertaken by the firm.

2.5 This policy applies to all individuals whose personal data is processed by the firm, regardless of the nature, duration, or formality of their relationship with the firm, and regardless of whether such relationship is ongoing, prospective, historical, or incidental.

2.6 This policy applies globally to the firm's processing activities, subject to mandatory local laws that may apply in specific jurisdictions. Where local law imposes additional or conflicting requirements, the firm will comply with those requirements to the extent applicable.

2.7 This policy does not apply to personal data processed by third parties acting independently of the firm, even where such third parties are linked to or accessible through the firm's websites or communications. Responsibility for such processing rests with the relevant third party in accordance with their own privacy practices.

2.8 Nothing in this policy limits or overrides any legal obligation to which the firm is subject, nor does it prevent the firm from complying with lawful requests, court orders, or regulatory requirements relating to the processing or disclosure of personal data.

### 3. Data controller and regulatory framework

3.1 For the purposes of applicable data protection legislation, the data controller in respect of personal data processed under this privacy policy is Aaran Beattie & Co., an independent advisory firm operating from the United Kingdom.

3.2 References in this policy to “the firm”, “we”, “us”, or “our” refer to Aaran Beattie & Co. and, where relevant, to any entity, vehicle, or structure through which the firm operates or may operate from time to time.

3.3 The firm processes personal data in accordance with the requirements of applicable data protection law in force in the United Kingdom, including the United Kingdom General Data Protection Regulation, the Data Protection Act 2018, and related secondary legislation, as amended or replaced from time to time.

3.4 Where personal data is processed in connection with activities that are subject to the laws of jurisdictions outside the United Kingdom, the firm will comply with such laws to the extent they apply, including any mandatory local data protection or privacy requirements.

3.5 The firm has not appointed a statutory data protection officer, as it is not required to do so under applicable law. Responsibility for oversight of data protection compliance rests with the firm.

3.6 The firm adopts internal policies, procedures, and controls designed to support compliance with applicable data protection obligations and to ensure that personal data is processed lawfully, fairly, and in a transparent manner appropriate to the nature of the firm’s activities.

3.7 Nothing in this policy is intended to confer regulatory status, create fiduciary obligations beyond those arising under law or contract, or limit the firm’s ability to structure its operations or governance arrangements in a lawful manner.

## 4. Personal data processed

4.1 The firm processes personal data in the course of carrying out its advisory, operational, administrative, and related activities. The personal data processed varies depending on the nature of the interaction, relationship, or engagement, and the context in which information is provided or generated.

4.2 The categories of personal data processed may include, without limitation, identification information, such as names, titles, professional roles, organisational affiliations, and other information used to identify an individual in a professional or personal capacity.

4.3 The firm may process contact information, including email addresses, telephone numbers, postal addresses, and other communication details provided or used in connection with interactions with the firm.

4.4 The firm may process professional and organisational information, including information relating to an individual's business activities, role, responsibilities, interests, or affiliations, where relevant to the firm's work or operations.

4.5 The firm processes correspondence and communications data, including records of emails, messages, documents, notes, and other written or oral communications exchanged with or relating to individuals.

4.6 The firm may process engagement-related and transactional information, including records relating to enquiries, instructions, agreements, arrangements, decisions, advice, deliverables, and related administrative or legal records.

4.7 The firm may process technical and usage data generated through the operation of its websites, systems, or infrastructure, including internet protocol addresses, device or browser information, server logs, access records, and other technical identifiers, where such processing is necessary for security, functionality, or lawful operation.

4.8 The firm may process information that is voluntarily disclosed by individuals in the course of communications or engagements, including information that may not have been expressly requested but is relevant to the context in which it is provided.

4.9 In limited circumstances, the firm may process special category personal data or information relating to criminal convictions or offences where such processing is necessary and lawful, subject to appropriate safeguards and restrictions required by applicable law.

4.10 The firm does not knowingly process personal data relating to children, and its services and activities are not directed at individuals under the age of eighteen. Where personal data relating to a child is inadvertently processed, the firm will take reasonable steps to address and, where appropriate, delete such data.

## 5. Sources of personal data

5.1 The firm collects personal data primarily from individuals themselves or from their authorised representatives, including through direct communications, correspondence, meetings, and interactions with the firm.

5.2 Personal data may be collected through the firm's websites, digital platforms, enquiry forms, portals, tools, or other systems operated by or on behalf of the firm, as well as through email, telephone, video calls, and other communication channels.

5.3 The firm may collect personal data in the course of providing advisory services, including information generated internally through analysis, judgement, evaluation, or record-keeping associated with an engagement or interaction.

5.4 Personal data may be obtained from third parties where this is necessary or appropriate for the purposes of the firm's activities, including from professional advisers, counterparties, service providers, or other persons involved in or connected with an engagement, transaction, or relationship.

5.5 The firm may obtain personal data from publicly available or professional sources, including corporate websites, professional profiles, public registers, filings, or publications, where relevant to the firm's work, compliance obligations, or legitimate interests.

5.6 In employment, contracting, or recruitment contexts, personal data may be obtained from referees, recruitment intermediaries, background screening providers, or other sources customarily used for such purposes, subject to applicable legal requirements.

5.7 Where personal data is obtained from sources other than the individual concerned, the firm will take reasonable steps to provide appropriate transparency in accordance with applicable data protection law, unless an exemption applies.

# 6. Purposes of processing

6.1 The firm processes personal data only for legitimate, defined, and proportionate purposes connected with the conduct of its activities and the operation of its business.

6.2 Personal data is processed for the purpose of assessing, establishing, managing, and delivering advisory engagements, including evaluating potential instructions, maintaining ongoing client relationships, exercising professional judgement, and providing advice and related services over time.

6.3 Personal data is processed to manage communications and interactions with individuals, including responding to enquiries, conducting discussions, issuing correspondence and documentation, and maintaining records of decisions, instructions, and exchanges.

6.4 Personal data is processed for operational and administrative purposes, including business management, record-keeping, scheduling, invoicing, payment processing, and the maintenance of internal systems and controls.

6.5 Personal data is processed to support employment, contracting, and recruitment activities, including the administration of working relationships, performance of contractual obligations, and compliance with legal and regulatory requirements applicable to such relationships.

6.6 Personal data is processed for legal and regulatory purposes, including compliance with applicable laws, regulations, professional obligations, and lawful requests from courts, regulators, or public authorities.

6.7 Personal data is processed to protect the firm's legal rights and interests, including the prevention and detection of fraud, misuse, or wrongdoing, the resolution of disputes, the enforcement of agreements, and the defence of legal claims.

6.8 Personal data is processed to ensure the security, integrity, and proper functioning of the firm's websites, systems, infrastructure, and communications, including monitoring, logging, and auditing activities where necessary and lawful.

6.9 Personal data may be processed to support the continuity, development, and improvement of the firm's activities, including internal analysis, planning, and institutional

record-keeping, provided such processing is compatible with the purposes for which the data was originally collected.

6.10 Personal data is not processed for purposes that are incompatible with those set out in this section, unless required or permitted by applicable law or with appropriate legal basis.

## 7. Lawful basis for processing

7.1 The firm processes personal data only where it has a lawful basis for doing so under applicable data protection law. The lawful basis relied upon depends on the nature of the data, the context in which it is processed, and the purposes for which it is used.

7.2 Personal data is processed where necessary for the performance of a contract to which the individual is a party, or in order to take steps at the request of the individual prior to entering into such a contract, including in connection with advisory engagements, employment or contracting arrangements, and related administrative activities.

7.3 Personal data is processed where necessary for compliance with a legal obligation to which the firm is subject, including obligations arising under tax, employment, regulatory, professional, or other applicable laws.

7.4 Personal data is processed where necessary for the purposes of the firm's legitimate interests, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the individual. The firm's legitimate interests include, without limitation, the operation and protection of its business, the delivery of advisory services, the maintenance of professional relationships, the safeguarding of confidential information, and the management of legal and operational risk.

7.5 Where processing is based on legitimate interests, the firm considers the nature of the data, the reasonable expectations of the individual, and the impact of the processing on the individual, and applies appropriate safeguards to ensure proportionality.

7.6 Personal data is processed on the basis of consent where required by applicable law. Where consent is relied upon, it is sought in a clear and specific manner and may be withdrawn at any time without affecting the lawfulness of processing carried out prior to withdrawal.

7.7 In limited circumstances, personal data may be processed where necessary to protect the vital interests of an individual or another person, or where processing is carried out in the public interest or in the exercise of official authority, to the extent applicable.

7.8 Where special category personal data or data relating to criminal convictions or offences is processed, the firm relies on an appropriate additional lawful condition and, where required, implements supplementary safeguards in accordance with applicable law.

## 8. Communications, monitoring and recording

8.1 The firm communicates with individuals through a range of channels, including email, telephone, video conferencing, messaging platforms, written correspondence, and other digital or electronic means, depending on the nature of the interaction or engagement.

8.2 Communications with the firm may be monitored, recorded, stored, and reviewed where lawful and technically feasible, including for the purposes of maintaining accurate records, supporting the delivery of advisory services, protecting the firm's legal and commercial interests, ensuring professional standards, and complying with legal or regulatory obligations.

8.3 Telephone calls, video calls, and other live communications may be recorded automatically and without contemporaneous verbal notification, where permitted by applicable law. This privacy policy constitutes standing notice that such recording may occur.

8.4 Written communications, including emails, messages, documents, notes, and other correspondence, are routinely retained as part of the firm's records and may be archived, indexed, and searched for operational, legal, or continuity purposes.

8.5 Where an individual objects to the recording of a live communication, the individual must notify the firm in advance. The firm is not obliged to conduct unrecorded communications and may decline, modify, or terminate an interaction or engagement where recording is considered necessary for legitimate professional, legal, or operational reasons.

8.6 Recordings and communication records are treated as confidential and are subject to appropriate technical and organisational safeguards. Access is restricted to the firm and to any authorised persons acting under duties of confidentiality, and only for purposes consistent with this policy.

8.7 Communications and recordings are not used for marketing, promotional activity, or public dissemination. Disclosure to third parties occurs only where lawful and necessary, including in connection with professional advisers, dispute resolution, enforcement of rights, or compliance with legal obligations.

8.8 Communications and recordings are retained in accordance with the firm's retention and archival practices as described in this policy, and may be retained for extended periods where necessary to support long-term advisory relationships, institutional record-keeping, or the protection of legal rights.

## 9. Cookies, tracking technologies and technical data

9.1 The firm's websites and digital platforms may use cookies and similar technologies, including small data files, scripts, and technical identifiers, to support functionality, security, and the proper operation of systems.

9.2 Essential cookies and technical processes may be used without consent where strictly necessary to enable core functionality, maintain security, prevent abuse, or ensure the stability and integrity of websites, systems, and communications.

9.3 Non-essential cookies or tracking technologies, including those used for analytics, performance measurement, personalisation, or other non-core purposes, may be introduced from time to time. Where required by applicable law, such technologies will be deployed only with appropriate consent mechanisms in place.

9.4 Where consent is required, individuals will be provided with clear information and meaningful choice, including the ability to accept or refuse non-essential cookies, or to adjust preferences through available settings or tools.

9.5 Technical data may be generated automatically when individuals access the firm's websites or systems, including internet protocol addresses, device identifiers, browser type, operating system, access times, referring URLs, and similar information. Such data is processed for legitimate technical, security, and operational purposes and is not used to identify individuals unless necessary and lawful.

9.6 The firm does not engage in behavioural advertising, profiling for marketing purposes, or the sale of personal data derived from cookies or tracking technologies.

9.7 The firm may update its use of cookies, tracking technologies, or technical processes as its websites, services, or infrastructure evolve. Any material changes will be reflected in this policy and, where required, accompanied by appropriate notices or consent mechanisms.

# 10. Disclosure and sharing of personal data

10.1 The firm treats personal data as confidential and does not disclose or share personal data except where such disclosure is lawful, necessary, and proportionate in connection with the purposes set out in this policy.

10.2 Personal data may be disclosed to third parties who provide services or support to the firm in connection with its operations, including, without limitation, providers of information technology, hosting, communications, document management, security, payment processing, professional services, or administrative support. Such third parties act only on the firm's instructions or under their own lawful obligations and are subject to appropriate confidentiality and data protection requirements.

10.3 Personal data may be disclosed to professional advisers, including legal, accounting, or other advisers, where necessary to obtain advice, manage risk, or protect the firm's legal and commercial interests.

10.4 Personal data may be disclosed where required by law, regulation, court order, or lawful request from a competent authority, or where necessary to establish, exercise, or defend legal claims. Any such disclosure will be limited to what is required or permitted by law.

10.5 In the event of a reorganisation, restructuring, transfer, or disposal of all or part of the firm's business or assets, personal data may be disclosed or transferred to prospective or actual counterparties and their advisers, subject to appropriate safeguards and lawful basis.

10.6 The firm does not sell, rent, or trade personal data, and does not disclose personal data to third parties for their own marketing or promotional purposes.

10.7 Where personal data is shared with third parties, the firm takes reasonable steps to ensure that such sharing is consistent with this policy and with applicable data protection law, and that personal data is not used for purposes incompatible with those for which it was disclosed.

# 11. Confidentiality and professional discretion

11.1 The firm operates on the basis that information relating to its work, relationships, and communications is treated with a high degree of discretion and confidentiality as a matter of professional practice.

11.2 Personal data processed by the firm is ordinarily treated as confidential and is accessed, used, and disclosed only to the extent necessary for the purposes described in this policy and in accordance with applicable law.

11.3 This privacy policy operates alongside, and does not replace, any separate confidentiality statements, engagement terms, or contractual obligations that may apply to particular relationships or circumstances.

11.4 The firm does not publicise client relationships, engagement details, or personal information, save where required by law or with appropriate consent. Where themes, patterns, or experience are referred to in general terms, this is done in a manner intended to avoid identification of individuals.

11.5 Nothing in this policy limits the firm's ability to comply with legal or regulatory obligations requiring disclosure of information, nor does it prevent the firm from taking steps necessary to protect its legal rights, enforce agreements, or respond to lawful process.

11.6 The firm's approach to confidentiality and discretion does not create obligations beyond those arising under applicable law or contract, and should not be construed as limiting the firm's professional judgement in the handling of information.

## 12. Data security and integrity

12.1 The firm implements technical and organisational measures designed to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage, taking into account the nature, scope, context, and purposes of processing.

12.2 Security measures may include access controls, authentication procedures, encryption, secure storage, monitoring, logging, and the use of reputable service providers with appropriate security standards. The specific measures applied may vary over time as systems and risks evolve.

12.3 Access to personal data is limited to the firm and to individuals authorised to act on its behalf who are subject to duties of confidentiality and data protection.

12.4 While the firm takes reasonable steps to safeguard personal data, no system or method of transmission or storage is entirely secure. The firm does not guarantee absolute security and individuals acknowledge that the provision of personal data is undertaken subject to this inherent risk.

12.5 In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of individuals, the firm will take appropriate steps to investigate, mitigate, and notify relevant parties in accordance with applicable legal requirements.

# 13. International transfers of personal data

13.1 Personal data processed by the firm may be stored or processed in jurisdictions outside the United Kingdom, including where service providers, infrastructure, or systems are located in other countries.

13.2 Where personal data is transferred outside the United Kingdom, the firm ensures that such transfers are carried out in accordance with applicable data protection law and are subject to appropriate safeguards.

13.3 Safeguards may include transfers to jurisdictions recognised as providing an adequate level of protection, the use of standard contractual clauses or other approved transfer mechanisms, or reliance on service providers that have adopted binding and enforceable data protection commitments.

13.4 International transfers are limited to what is necessary for legitimate operational, professional, or legal purposes, and are reviewed periodically to ensure continued compliance.

## 14. Retention and archival of personal data

14.1 The firm retains personal data only for as long as is necessary for the purposes for which it was collected and processed, including the delivery of advisory services, maintenance of records, protection of legal rights, and compliance with legal and regulatory obligations.

14.2 Retention periods vary depending on the nature of the data, the context in which it was processed, and applicable legal or operational requirements. The firm does not apply rigid retention schedules where flexibility is required to support long-term advisory relationships or institutional continuity.

14.3 Personal data may be archived and retained for extended periods where necessary to preserve records of decisions, advice, or interactions, or to support the firm's legitimate interests in continuity, accountability, and risk management.

14.4 Where personal data is no longer required, it is securely deleted, anonymised, or otherwise rendered inaccessible, unless further retention is required or permitted by law.

14.5 Anonymised information that no longer constitutes personal data may be retained indefinitely for internal analysis, planning, or reference purposes.

## 15. Individual rights

15.1 Individuals whose personal data is processed by the firm have certain rights under applicable data protection law, subject to limitations and exemptions provided by law.

15.2 These rights may include the right to request access to personal data, to request rectification of inaccurate or incomplete data, to request erasure or restriction of processing in certain circumstances, to object to processing based on legitimate interests, to request data portability where applicable, and to withdraw consent where processing is based on consent.

15.3 Requests to exercise data protection rights should be made in writing using the contact details set out in this policy. The firm may require reasonable information to verify the identity of the individual making the request before responding.

15.4 The firm will respond to valid requests within the time limits prescribed by law, and may refuse or limit requests where permitted by applicable law, including where compliance would adversely affect the rights of others, conflict with legal obligations, or prejudice the firm's legitimate interests.

15.5 Individuals also have the right to lodge a complaint with the relevant supervisory authority if they consider that their personal data has been processed unlawfully.

## 16. Changes to this privacy policy

16.1 The firm may amend this privacy policy from time to time to reflect changes in law, regulation, guidance, operational practices, or the firm's activities.

16.2 Updated versions of this policy will be made available through the firm's websites or by other appropriate means, with the effective date indicated.

16.3 Continued interaction with the firm following publication of an updated policy constitutes acknowledgement of the revised terms, subject to applicable legal requirements.

## 17. Contact details and supervisory authority

17.1 Questions, requests, or concerns relating to this privacy policy or the processing of personal data should be directed to the firm using the contact details provided on its website or in its communications.

17.2 The firm will address privacy-related enquiries in accordance with applicable law and within reasonable timeframes.

17.3 The supervisory authority responsible for data protection in the United Kingdom is the Information Commissioner's Office. Individuals may contact the Information Commissioner's Office if they have concerns about the firm's handling of personal data that have not been satisfactorily resolved.