

PRIVACY POLICY

Data Privacy and Protection Policy

At DKK Partners Ltd, we are committed to protecting and respecting your personal information. We have established a framework that ensures personal data is collected, processed, stored and disclosed fairly, transparently and securely, in line with the following:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Applicable FCA and HMRC requirements
- Any other international data protection obligations relevant to our operations

Personal Data is any information relating to an identified or identifiable natural person, such as a name, identification number, location data, online identifier or one or more factors relating to physical, genetic, mental, economic, cultural or social identity.

General requirements

Personal Data will only be processed by DKK Partners Ltd in the following circumstances:

- In accordance with a lawful processing basis under the UK GDPR.
- In a lawful, fair and transparent manner.
- For specified, explicit and legitimate purposes determined at the time of collection.
- In a way that is relevant and limited to what is necessary in relation to those purposes.
- Where the data is accurate and, where necessary, kept up to date, including by rectification or erasure without undue delay.
- Kept securely and protected against unauthorised or unlawful processing (including transfers), and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

Personal Data must not be processed unless one of the following lawful bases applies:

Under the UK GDPR, DKK Partners Ltd will only process Personal Data where at least one of the following lawful bases applies.

- The individual has given consent to the processing of personal data for one or more specified purposes.
- Processing is necessary for the performance of a contract to which the individual is a party, or to take steps at the request of the individual prior to entering into a contract.
- Processing is necessary for compliance with a legal or regulatory obligation to which DKK Partners Ltd is subject, including FCA and HMRC requirements and anti-money laundering regulations.

- Processing is necessary to protect the vital interests of the individual or of another natural person.
- Processing is necessary for the legitimate interests of DKK Partners Ltd or a third party, provided such interests are not overridden by the rights and freedoms of the individual (e.g. preventing fraud, ensuring security of our systems and services, managing risk or improving our services).

Rights of the Client in Relation to Data Protection

As a client, you have rights under the UK GDPR. These include the right to request access to personal data we hold about you, to request correction of inaccurate or incomplete information, and to ask us to erase your data where there is no lawful basis for us to retain it.

You may request that we restrict the processing of your personal data in certain circumstances, or object to processing carried out on legitimate interest grounds, including profiling. You also have the right to receive your data in a machine-readable format or to request that it be transferred to another controller. Where processing is based on consent, you have the right to withdraw that consent at any time.

We do not carry out solely automated decision-making that has a legal or similarly significant effect on you.

These rights are not absolute and may be subject to legal or regulatory limitations.

If you wish to exercise any of these rights, please contact our Privacy Office at privacy@dkkpartners.com

General Obligations of DKK Partners Ltd

DKK Partners Ltd is responsible for ensuring that all personal data is processed fairly, transparently and securely, and only for specified, legitimate purposes.

We retain personal data only for as long as necessary to provide services, comply with FCA and HMRC requirements, and satisfy applicable statutory limitation periods. In most cases this means keeping records, including KYC and transaction data, for a period of at least five years after the end of the client relationship or the completion of a transaction. Certain records may be retained for up to six years to comply with limitation periods under UK law, or longer where required by regulatory authorities.

We may share personal data with third parties where necessary, including:

- Banking partners and payment providers – to process transactions, which may involve transfers outside the UK where cross-border settlement is required.
- Trusted partners – where services are provided jointly or where you have been referred to us, subject to strict confidentiality and security obligations.
- Other parties – such as e-commerce platforms, fraud prevention agencies, or parties to mergers or acquisitions, where necessary to prevent crime or enable lawful business activities.
- Regulators and law enforcement authorities – including the FCA, HMRC, the NCA and courts of law, where disclosure is legally required.

We may also collect and process information about connected parties (such as directors and shareholders of client companies) and beneficiaries of transactions who may not themselves be clients. Clients are responsible for informing connected parties of this Privacy Policy.

All calls and correspondence with us may be recorded and retained for regulatory compliance, training, quality assurance and as evidence of transactions.

- Technology and service providers – who support our operations (such as IT hosting, KYC verification platforms, and payment infrastructure providers), subject to strict data protection safeguards.

General Obligations of the Privacy Office

DKK Partners Ltd has established a Privacy Office to oversee compliance with UK data protection requirements. The Privacy Office reports directly to senior management and is responsible for advising staff on data protection obligations and internal policies, monitoring compliance, coordinating responses to data subject rights requests, and overseeing breach management.

The Privacy Office also serves as the main contact point for the Information Commissioner's Office (ICO) and other regulators on data protection matters.

You can contact the Privacy Office at privacy@dkkpartners.com

Failure to Comply and Breach Notification

If DKK Partners Ltd becomes aware of a personal data breach, we will promptly assess and contain the incident. Where required by law, we will notify the ICO within 72 hours and inform affected individuals if the breach is likely to result in a high risk to their rights and freedoms.

All breaches are recorded, investigated and documented, and corrective measures are taken to mitigate any potential harm. We will cooperate fully with the ICO and other relevant authorities in the event of an investigation.

Contact Information

Privacy Office

DKK Partners Ltd

4th Floor, 33 Cannon St

London, EC4M 5SB

Email: privacy@dkkpartners.com

If you are dissatisfied with how we process your personal data, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk

- Phone: 0303 123 1113