

HIGHLANDS NATURAL RESOURCES

PRIVACY NOTICE

INTRODUCTION

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

A “data controller” is responsible for deciding how to hold and use personal data. Personal data is information or data from which you can be identified and is about you. Highlands Natural Resources plc (“Highlands” or “the Company”) is therefore a “data controller” in relation to the personal data that we receive in connection with your contact with us, either in relation to the provision of services or otherwise. We also act as a data controller for the Highlands Natural Resources group as listed in Appendix 1.

We are required under data protection legislation to notify you of the information contained in this privacy notice and it is important that you understand it. If there is anything in this notice that you do not understand, please speak to our Data Protection Appointed Person who can be contacted via email info@highlandsnr.com or by telephone on **02086633337**

THE INFORMATION THAT WE HOLD ABOUT YOU

In order that we can provide our services or information to you, we will collect, store and use some or all of the following categories of personal information about you depending on your instructions and the services we, or you, provide:

| Category | Examples |
|--------------------------|---|
| Personal Contact Details | Name, title, addresses, telephone numbers, personal email addresses |
| Biographical Data | Date of birth, gender, marital status, |
| Financial Data | Bank account details, Payment card details |

We do not normally collect, store or use biographical data although this may be obtained from time to time. We do not normally collect, store or use more Sensitive Personal

Data or “special categories of data” as it is known under the GDPR. Sensitive Personal Data requires a higher level of protection, and includes:

Special Categories of Data – or Sensitive Personal Data

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Biometric data.
- Information about criminal convictions and offences

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, it may delay performance of that contract, or we may be prevented from complying with our legal obligations.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or by a regulatory body.

SENSITIVE PERSONAL DATA

The law requires that we need to have further justification for collecting, storing and using Sensitive Personal Data as described above. We do not collect Sensitive Personal Data.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING

We may have to share your personal data with third parties, including our suppliers and other entities within the Highlands group of companies.

We will share your personal data with third parties where required by law or a regulatory body, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

We may disclose your personal data to:

- other companies within our group;
- service providers under contract with us to support our business operations, such as fraud prevention, debt collection, technology services and credit reference agents;
- trade associations or regulatory bodies of which we are a member;
- law enforcement or government agencies in connection with any investigation to help prevent or detect unlawful activity;

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Unless you have consented to us retaining your data explicitly;

we currently retain personal data for a period of 7 years from the termination of the agreement or contact between us and you.

where we are in ongoing communication with you we will retain your data indefinitely.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client or contact of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

USE OF COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device such as a mobile telephone or tablet) when you use our website. We use cookies on our website and may also use other similar tracking technologies such as web beacons, action tags, Local Shared Objects ('Flash cookies') or single-pixel gifs on our website. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify you individually. We use analysis software to look at IP addresses and cookies to improve your experience as a user of our website. We do not use this information to develop a personal profile of you. If we do collect personally identifiable information, we will make it clear when we collect this data and will explain what we intend to do with it.

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

.RESPONSIBILITY FOR DATA PROTECTION

We have appointed a Data Protection Lead to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the Company Secretary, Highlands Natural Resources plc, 9 Limes Road, Beckenham, Kent, BR3 6NS UK. 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.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

The latest version of this privacy notice will always be available at www.highlandsnr.com

If you have any questions about this privacy notice, please contact the Company Secretary, Highlands Natural Resources plc, 9 Limes Road, Beckenham, Kent, BR3 6NS, UK.

HOW DO WE COLLECT AND USE YOUR PERSONAL DATA?

We collect personal information about you (such as your name, postal address, email address, phone numbers, date of birth, payment details) when you sign up to participate in or receive a service from us, , making an enquiry, entering into a contract with us, or otherwise deal with us either online or face to face. We may also collect personal information when you contact us, send us feedback or complete surveys. Our website also uses cookies (see “Use of cookies” section below) and collects IP addresses (which means a number that can uniquely identify a specific computer or other device on the internet).

Most commonly, we will use your personal data in the following circumstances:

1. To provide you with the information you have requested,
2. To follow up your specific enquiry,
3. Where we need to perform the contract we have entered into with you, in connection with the provision of your or our services.
4. Where we need to comply with a legal or regulatory obligation.
5. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else’s interests).
2. Where it is needed in the public interest or for official purposes.

We primarily need all the categories of personal data in the list above to enable us to perform our contract or agreement with you, provide services to or receive services from

you and to enable us to comply with legal or regulatory obligations. The situations in which we anticipate we will process your personal data are listed below.

- Making a decision about your or our services.
- Determining the terms on which we work with you.
- Advising you.
- Providing you with information
- Administering any contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting reviews and managing performance.
- Making arrangements for the termination of our working relationship.
- Dealing with legal disputes involving you.
- To prevent fraud.
- To monitor your use of our information and communication systems.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- if we need to share that information to comply with the law or to enforce any agreement we may have with you or to protect the health and safety of any person;
- to discuss your account with any person who you have named as a person we can contact;
- to liaise with any person who is your agent or representative, such as the holder of a power of attorney, a legal guardian or person administering a will;
- in respect of any person with whom we are negotiating with as a potential buyer of our business or property or if we are proposing to merge our business with another business;
- any person or business where we act as the data controller on their behalf as part of a managed services agreement and where the business is traded under the Highlands brand
- credit card associations if specifically required;

If we use an outside party to process your information, we will require them to comply with our instructions in connection with the services they provide for us and not for their own business purposes.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

We have put in place a Standard Privacy Policy and appropriate technical and organisational security measures to protect the security of your information and 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.

Our website may contain links to websites and applications owned and operated by other people and businesses. These third-party sites have their own privacy policies and use their own cookies and we recommend that you review them before you provide them with personal information. They will tell you how your personal information is collected and used whilst you are visiting these other websites. We do not accept any responsibility or liability for the content of these sites or the use of your information collected by any of these other sites and you use these other sites at your own risk.

YOUR DATA RIGHTS

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances, by law 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 information we hold about you corrected.
- **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 exercised your right to object to processing (see below). However, there may be reasons why we cannot agree a “request to be forgotten” or for data to be erased, such as where we need to retain it for regulatory or other reasons.
- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact info@highlandsnr.com.

Depending on the circumstances, we may request information to confirm your identity before processing your request. We may also charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Company Secretary, Highlands Natural Resources plc, 9 Limes Road, Beckenham, Kent, BR3 6NS, UK.. Once we have received notification that you have withdrawn your consent, we will no longer process

your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

Appendix 1

Highlands group companies for which Highlands Natural Resources plc as Data Controller

Highlands Natural Resources plc
Brent Natural Resources Limited
Highlands Natural Resources Corp
Highlands Montana Corp

Last updated: 25/05/2018