



PRIVACY POLICY **July/2024**

PLEASE READ THIS POLICY CAREFULLY BEFORE REGISTERING FOR AN ACCOUNT WITH US

HSK PROPERTY GROUP (**we/us/our**) are committed to protecting and respecting your personal data and your privacy. We recognise that your personal data is your property and that you have provided it to us for specific purposes.

Unless otherwise required by law, the Information Commissioner's Office (**ICO**) guidance or best practice, or in order to perform our contract with you, we will only process your personal data in the way we tell you or in the way you ask us to, and we will give it back to you at any time **or delete from our records.**

1. This Policy

1.1 This policy, together with the Investor Terms & Conditions, explains how any personal data we collect from you, or that you provide to us, will be processed by us or any processor on our behalf.

1.2 This policy applies to our contract with you. You are therefore advised to read it carefully. Terms used within it shall have the meaning(s) given in the Data Protection Act 2018 (**Act**) and/or the General Data Protection Regulation (**Regulation**), as applicable

1.3 By visiting our website located at www.hskpropertygroup.com (**our Website**), or by registering for an account with us, you accept and consent to the practices described in this policy.

1.4 Any changes we make to this policy will be posted on this page. You are advised to check back frequently as any changes will be binding on you when you continue to use the Website after the date of the relevant change.

1.5 You can opt-out of receiving marketing communications at any time by using the opt-out link at the bottom of any marketing communication you may receive from us, **or** by emailing info@hskpropertygroup.com

1.6 If you have any queries relating to this policy, please contact us at info@hskpropertygroup.com

2. Who we are



2.1 We are HSK Property Group Ltd. We operate the Website and we are the **data controller** for the purposes of the Act and the Regulation. **Rausull Choudhary is our data protection officer.**

2.2 We are registered with the ICO to process your personal data and our registration number C1363197

3. Your consent

3.1 By registering for Account and/or otherwise using the Website, you expressly consent to:

- **3.1.1** provide us and HSK Property Group Ltd with the personal data necessary to allow you to use the Website and make Investments through it;
- **3.1.2** the processing of your personal data by us and/or HSK Property Group Ltd, or those specifically listed third parties, in accordance with this policy; and
- **3.1.3** the transfer of your personal data to those third parties listed in this policy, for the reasons specified.

3.2 You may withdraw your consent under 3.1 at any time. However, where the withdrawal of your consent prevents us or HSK Property Group Ltd from verifying your identity or otherwise monitoring who you are, you will be unable to use your Account and make Investments through our Website **OR** You may exercise your rights under 3.1 at any time, which includes withdrawing your consent to our processing of your personal data. However, where this withdrawal prevents us from performing our contract with you, we may not be able to provide our goods and services to you.

4. What we collect

4.1 We may collect all or some of the following categories of data from you: **(This list is not exhaustive)**

Title	Full Name	Address (including postcode)	Date
Email address	Nationality	Bank account details	IP ad

4.2 When you make an Investment, you will be required to provide your identity document **including photo ID verification** to allow **HSK** to satisfy its Know Your Customer (KYC) regulatory requirements. Any associated personal data contained on that document will be retained by us or HSK Property Group Ltd. **All data is held securely.**



4.3 In addition to the above, we will also provide you with your Account Details, which includes your username which is either created by, or assigned to, you. The Account Details should be remembered by you, but will be stored by us in case you forget them.

5. How we collect your data

The data listed in section 4 is collected in the following ways:

- **5.1 By you registering for an Account** – this is any information you give to us that we request from you when signing-up for an Account to use our Website.
- **5.2 Information collected** – each time you visit our Website, whether through your home, work or a public network, your own computer or mobile device, HSK Property Group Ltd will automatically collect **data mentioned in 4.1**

6. What we do with your data

6.1 Your data is primarily necessary to verify who you are when accessing your Account and to ensure you meet our eligibility requirements in order to submit an Application and make an Investment.

6.2 Additionally, we or HSK Property Group Ltd will use all of your data you provide us to notify you about:

- **6.2.1** similar Projects or Properties listed on our Website that are similar to those you have already Invested in, or otherwise viewed or enquired about; or
- **6.2.2** changes to our Website or our services.
- **6.3** We or HSK Property Group use any data we collect about you (as a result of your visit to our Website) to:
 - **6.3.1** personalise and improve our services (including the Website and its security);
 - **6.3.2** deal with your inquiries and requests;
 - **6.3.3** administer and monitor traffic and behaviours on our Website for analysis, testing, research, statistical and survey purposes;
 - **6.3.4** ensure that any part of our Website (including any Content) is presented in the most effective manner for you and your computer or device, and to make improvements (where necessary); and
 - **6.3.5** keep our Website safe and secure.

7. How and why we disclose your data



7.1 In addition to the transfers contemplated by part 8.1, we or HSK Property Group Ltd may transfer or disclose your personal data to:

- **7.1.1** any prospective buyer of any part of the relevant business or assets in connection with the sale (in which case, any personal data held by us or [company name] about you and our Account Holders will be one of the transferred assets);
- **7.2.2** comply with any legal obligation (such as where stated at clause 6.5 of the [Investor Terms and Conditions](#));
- **7.2.3** enforce or apply any part of our [Investor Terms and Conditions](#) generally; or
- **7.2.4** protect our rights or our property, or those of our other Account Holders.

7.3 Any websites which are linked from the Website are outside of our control and not covered by this policy. If you access those websites using the links provided, the website operators may collect information from you which will be used by them in accordance with their own privacy policies (if any). These policies may differ from ours, and we cannot accept any responsibility or liability in respect of these.

8. Security

8.1 We have put in place appropriate technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable Data Protection Laws.

8.2 Each member of staff has unique log-in details and authentication software requires these to access the systems. Staff have access to personal data only for the purposes of performing their roles.

8.3 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Your rights

9.1 In relation to all of your personal data, you have the following rights to ask us or us or HSK Property Group Ltd (in addition to any rights you may have under the Act or the Regulation):

- **9.1.1** not to process your personal data for marketing purposes;
- **9.1.2** to clarify what data we or HSK Property Group hold about you, how it was obtained, to whom it has been disclosed and for how long it will be stored;
- **9.1.3** to amend any inaccurate data we or HSK Property Group hold about you;



- **9.1.4** to delete any of your data (where you no longer think we or HSK Property Group need to hold it or you think we or HSK Property Group have obtained it or processed it without your consent at any time); and
- **9.1.5** to only process your personal data in limited circumstances or for limited purposes.

9.2 If you wish to exercise any of your rights at any time, please contact us on the details contained at the beginning of this policy in the first instance. We will require you to verify your identity to us before we provide any personal data, and reserve the right to ask you to specify the types of personal data to which your request relates.

9.3 Where you wish to exercise any of your rights, they may be subject to payment of a nominal administration fee (to cover our costs incurred in processing your request) and any clarification we may reasonably require in relation to your request. Such fees may be charged where we consider (acting reasonably) that your request is excessive, unfounded or repetitive.

9.4 Any data provided to you in accordance with your rights will be in a structured and **communicated accordingly**.