



Privacy Policy

Thank you for visiting **3ccapital.com**. We treat the personal data of our users with great consideration.

Introduction

This privacy policy explains in detail the types of personal data that we may collect and process about you when you visit our website, including any data you may provide through this website. It also explains how we'll store and handle that data, when and why we share your data with third-party service providers, and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

When we refer to 'our website' we principally mean our main website **3ccapital.com**

Controller

3C Group IC Limited is the controller and responsible for your personal data (collectively referred to as, the 'company', 'we', 'us' and 'our' in this privacy policy).

Our full details are:

Full name of legal entity: 3C Group IC Limited

Email address: info@3ccapital.com

Postal address: PO Box 511, Town Mills, Rue du Pré, St Peter Port, Guernsey, GY1 6DU

Changes to this privacy policy

This version was last updated on [see foot of page] and historic versions can be obtained by contacting us.

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

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies or use of your personal data. When you leave our website, we encourage you to read the privacy notice of every website you visit.

What personal data do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).



When you visit our website, 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, last name].
- Contact Data includes [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].
- Usage Data includes [information about how you use our website, products and services].

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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 data about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

When do we collect your personal data?

We collect personal data when you:

- Contact us with an enquiry or comment via email or telephone.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.



- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. Where we rely on consent, you have the right to withdraw consent to marketing at any time by contacting us.

The following list provides general detail about the types of data we process, why we process it, and the lawful basis upon which we do so:

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

- Types of data: a) Identity, b) Contact, c) Technical
- Lawful basis: 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 use data analytics to improve our website, products/services, marketing, customer relationships and experiences

- Types of data: a) Technical, b) Usage
- Lawful basis: 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)

Third-party marketing

We will not disclose, rent, sell, share or otherwise transfer your personal data with third parties for marketing purposes.

Change of purpose

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis upon which we 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.

How we protect your personal data

Your personal data is stored securely on databases and servers. These databases and servers are maintained either by us or by our third-party service providers.



We maintain administrative, technical and physical safeguards to protect against unauthorised access, use, modification and disclosure of any personal data in our custody and control. Internal access to personal data is restricted to specific employees.

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.

Who do we share your personal data with?

We may transfer your personal data to trusted third-party service providers, after we collect this data from you. All of our service providers are required to maintain the confidentiality and security of your personal data and to use it only in compliance with data privacy laws and for specified purposes in compliance with our instructions. Each service provider is also responsible for their use of your personal data, according to rules they set in their own privacy policies.

We use other tools and software to help deliver functionality on our website. The companies that provide these services may also process your personal data – even if that is limited to technical data such as IP address or device id. They include:

- Google

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, 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.

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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.

If you wish to exercise any of the rights set out above, please contact us.

Cookie Policy

What are cookies?

Cookies are small text files, which are set by us in your web browser. Cookies store data that enhances your experience of the website (for example saving your shopping bag between pages); they also enable us to gather anonymous information on website use, which we can use to improve our service to you; they are also used by some of our third-party service providers, again to track usage and to save data between pages.

How we use cookies

We use cookies to:

- Anonymously record and analyse website usage



- Store information that you set whilst using the website (e.g. the visibility of a notification)

We may also use cookies to personalise your experience on our website, by recognising you and tailoring content or product and service offerings.

How to control or delete cookies

The majority of web browsers automatically enable cookies as a default setting. To stop cookies being stored on your computer in future, you'll need to alter the settings of your web browser. You should also be able to delete cookies via your browser settings.

You can find instructions on how to control or delete cookies by clicking 'Help' in your browser's menu bar, or by following these browser-by-browser instructions from [AboutCookies.org](https://www.aboutcookies.org/).

For Google Analytics cookies you can also stop Google from collecting your information by downloading and installing the [Google Analytics Opt-out Browser Add-on](#).

Please note that by deleting our cookies or preventing future cookies your experience on our website will be limited.

How to contact us

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint, please contact info@3ccapital.com. We aim to respond to all queries within 48 hours.