

Website Privacy Policy

1 Objective

- 1.1 We value and respect the trust our customers and visitors place in us when they provide access to their Personal Data.
- 1.2 'Personal Data' means information which relates to a living person who can be identified from that data on its own, or when taken together with other information which is likely to come into our possession
- 1.3 This policy describes how we work to maintain trust and protect your information; it also explains how we collect, use and disclose any personal data you provide when you access or use our services and website (Site).

2 Scope

- 2.1 We are fully committed to compliance with data protection laws; up to and including 24 May 2018, the Data Protection Act 1998 and from and including 25 May 2018 the General Data Protection Regulation (GDPR) ((EU) 2016/679) together with and as amended by any UK implementing laws, regulations and secondary legislation from time to time in the UK (Act).
- 2.2 This policy covers only data that we collect through the Site and not any other data collection or processing, including, without limitation, the data collection practices of any third party, including any third-party operators of web pages to which the Site links. Accessing those links will cause you to leave our Site and may result in the collection or sharing of information about you by a third-party.
- 2.3 We do not control, endorse or make any representations about those third-party websites or their privacy practices, which may differ from ours. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal data.
- 2.4 By using the Site or providing information to us you will have accepted the policy in force at the time of use. This policy was last reviewed at the date of publication detailed at the foot of the document. We may amend this policy at any time.

3 Responsibilities

It is the responsibility of the Management Team of HTF Associates (Company) to monitor the effective implementation of this policy.

4 Related Documents and References

N/A

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5 General

5.1 The Company processes personal data in accordance with the Act and as far as is reasonably possible in a transparent and fair manner.

5.2 As part of the standard operation of the Site, information from your computer or mobile device, including, but not limited to, your browser type, operating system, IP address and the domain name from which you accessed the Site may automatically be collected and stored by the equipment of third parties that we have a relationship with for that purpose.

5.3 The Company will only share your personal data in the following manner:

5.3.1 Sharing with service providers

- We may retain service providers to manage or support certain aspects of our business operations on our behalf. These service providers may be located in the UK or in other global locations and may provide services such as credit card processing and fraud management services, email service providers, data hosting, management or support of our site. Our service providers are required by contract to safeguard any personal data they receive from us and are prohibited from using the personal data for any purpose other than to perform the services as instructed by us.

5.3.2 Compliance with the Law

- We may also share your personal data when we believe, in good faith, that we have an obligation to:
 - o respond to duly authorised information requests of law enforcement agencies, regulators, courts and other public authorities, including to meet national security or other law enforcement requirements;
 - o comply with any law, regulation, subpoena, or court order;
 - o investigate and help prevent security threats, fraud or other criminal or malicious activity;
 - o enforce/protect our rights; or
 - o protect the rights or personal safety of our employees and third parties on or using our property when allowed and in line with the requirements of applicable law

5.3.3 Contact

- When you give us contact information (such as your name, address and/or email address) you agree that we may utilise this information. You agree that we may, as part of our services to you, communicate with you, or initiate communication with you on behalf of a third party, through means such as email, telephone (including mobile phone), or postal mail, including through the use of contact information that you may provide to us or that we may otherwise obtain from third-party resources.

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5.4 Opting Out

5.4.1 If you have the option of subscribing to communications from us related to our products or services, you can make or change your choices about receiving either subscription or general communications from us regarding these services by taking action as described in the communication. These options do not apply to communications primarily for the purpose of administering advice, contracts, support, or other administrative and transactional notices where the primary purpose of these communications is not promotional in nature.

5.5 Security

5.5.1 We use reasonable security measures to help protect against the loss, misuse and alteration of the Personal Information under our control. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. In addition, please note that emails, messages sent via your web browser, and other similar means of communication with other users, are not encrypted. We strongly advise you not to communicate any confidential or sensitive information through these means. Therefore, while we strive to protect your information, we cannot guarantee its security.

5.5.2 Please also be aware that we may use third-party cloud service providers that provide hosting, data storage and other services pursuant to standard terms and conditions that may be non-negotiable; these service providers have informed us or the general public that they apply security measures they consider adequate for the protection of information within their system, or they have a general reputation for applying such measures. However, we will not be liable (to the fullest extent permitted by law) for any damages that may result from the misuse of any information, including Personal Information, by these companies.

5.6 Complaints/Requests

5.6.1 Please contact us by telephone on 01527 572060 or by email enquiry@htfassociates.co.uk if you have any requests or concerns about either your personal information or the information contained on our website or within this policy.

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6 Version Details

Version No.	Effective Date	Revised Change(s)
01	09 Nov 2021	Annual review – minor amendments
02	07 Nov 2022	Annual review – minor amendments
03	01 Nov 2023	Annual Review
04	01 Nov 2024	Annual Review – minor amendments
05	01 Nov 2025	Annual Review – minor amendments
06	13 Oct 2026	Annual Review – minor amendments

7 Review and Approval

Reviewed By	Print Name	Signature	Date
	Gemma Richardson	Signed by:  4CE9199BEBCD405...	12-Oct-2026 10:02 B
Management Approval	Print Name	Signature	Date
	Dee Jessup	DocuSigned by:  70A062409BD148F...	12-Oct-2026 10:43 B