

Privacy Policy

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1. Introduction

This privacy policy contains important information on how and why Blue Ocean Investment Manager Limited collects, uses and shares your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

When we refer to “Blue Ocean”, “we”, “us”, or “our” we mean Blue Ocean Investment Partners Limited with its registered offices at Suite 1002, 9 Steedman Street, London SE17 3BA.

2. Personal information that we collect about you

“Personal Information” is any information that can be used to identify you or that we can link to you and which we have in our possession or control.

We may collect and use the following Personal Information about you. Where you supply services to us as a Supplier: (a) name and contact information, including email address and telephone number and company details; (b) billing information; (c) professional online presence, e.g. LinkedIn profile; and (d) telephone conversations that we may record. Where you supply service to us as a Consultant: (a) name and contact information, including email address and telephone number and company details where applicable; (b) billing information; (c) emergency contact details; (d) date of birth; (e) CV including education and qualification details; (f) passport details; and (g) recordings of email/phone correspondence and use of internet and social media in accordance with Blue Ocean’s policies available on Blue Ocean’s intranet. Where we supply service to you: (a) name and contact information, including email addresses and telephone number and company details; (b) KYC information as required by applicable laws; (c) billing information; (d) professional online presence, e.g. LinkedIn profile; (e) telephone conversations that we may record; and (g) information about how you use our website, communication other systems. Where you apply for a role with us: (a) name and contact information, including email addresses and telephone number; (b) date of birth; (c) nationality; (d) CV including education and qualification details; (e) passport details; (f) pre-employment screening information; (g) any other details as set out in your application; and (h) telephone conversations that we may record.

3. How your Personal Information is collected

We collect most of this Personal Information directly from you—in person, by telephone, text, or email and/or via our website. However, we may also collect information: (a) about your use of

our services or when we otherwise interact or correspond with you; (b) from publicly accessible sources, e.g. Companies House; (c) from a third party that provides pre-employment screening services to us, if you apply for a position with us; (d) from third parties to fulfil any relevant KYC requirements; from counter parties to transactions, regulators or authorities where we provide services to you; and (f) from cookies on our website (see the section on cookies below).

4. How we use your Personal Information

We may use your Personal Information to do the following: (a) arrange for receipt of goods and services from you, manage our relationship and to pay you where you are our Supplier or Consultant; (b) provide services to you where you are our client. This may include sending you newsletters and other information that may be of interest to you; (c) review and process your job application where you have applied for a position with us; (d) comply with legal and regulatory obligations that we have to discharge; (e) look into any complaints or queries you may have; (f) prevent and respond to actual or potential fraud or illegal activities; (g) for our legitimate business interests, such as undertaking business research and analysis and managing the operation of our business; (h) establish, exercise or defend our legal rights for the purposes of legal proceedings; and (i) record and monitor the use of our website and other technical systems.

5. Grounds for using your Personal Information

We process your Personal Information on the following legal grounds: Performance of a contract: We will mostly need to collect and use your Personal Information either to enter a contract with you or to perform our obligations under a contract with you. Legitimate Interest: Where we do not perform a contract, we may use your Personal Information for our legitimate interest. Compliance with applicable laws: we may be required to use your Personal Information to comply with applicable laws and regulations. Consent: we may, but do not normally need to, rely on your consent to use your Personal Information. If we do, you can withdraw your consent by contacting us.

6. Who we share your Personal Information with

We may share your Personal Information with: (a) third parties who are bound by confidentiality obligations, in connection with the processing of your Personal Information for the purposes described in this policy, including but not limited to IT and communications service providers; (c)

third parties relevant to the financial services that we provide, including but not limited to counter parties to transactions, other professional service providers, regulators, authorities and stock exchanges; (d) any third party that has the right to request your Personal Information under applicable laws and regulations; and (e) external auditors and professional advisers as necessary.

Where we transfer your Personal Information outside of Europe, we will take all reasonable efforts to ensure that it is adequately protected by either transferring to: (a) a country that is approved by the European Commission; (b) a recipient who signed a “model contractual clause” approved by the European Commission, obliging them to protect your Personal Information; or (c) a recipient in the US who is a certified member of the EU-US Privacy Shield scheme.

7. How long your Personal Information will be kept

We will keep your personal information for as long as is necessary for the relevant purpose and as long as may be required by applicable law.

8. Cookies

A “cookie” is a small file, typically of letters and numbers, downloaded on to a device when a user visits certain websites. Cookies allow a website to recognize a user’s device, through an IP address, without collecting information about the user’s identity. For more information about cookies see <https://www.allaboutcookies.org/>. We use cookies to help us to determine what page you may see next time you visit the website. To do this, we use persistent cookies that do not expire for a period of up to 12 months at the end of a user session. The cookie stored on your web browser does not contain any personal information. It is encrypted and only the Blue Ocean web server can read it.

We use the following cookies: Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website. Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region). Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have

followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookies in use on this website.

Your consent applies to the following domains: www.blueoip.com.

Cookie declaration last updated on 20 January 2024, from a Cookie-script report.

Necessary (1)

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Name	Provider	Purpose	Type	Expiry
__cf_bm	hubspot.com	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	HTTP	30 minutes

Performance (3)

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Name	Provider	Purpose	Type	Expiry
_ga	blueoip.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	HTTP	1 year 1 month
_gid	blueoip.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	HTTP	1 day
_ga_NRQTDZ9NSK	blueoip.com	This cookie is used by Google Analytics to persist session state.	HTTP	1 year 1 month

Unclassified (2)

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

Name	Provider	Purpose	Type	Expiry
crumb	blueoip.com	Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the web site and visitor.	HTTP	Session
_cfuvid	hubspot.com		HTTP	Session

Targeting (1)

Targeting cookies are cookies that remember your preferences.

Name	Provider	Purpose	Type	Expiry
_gat_gtag_ UA_11260 4002_1	blueoip.com	This cookie is part of Google Analytics and is used to limit requests (throttle request rate).	HTTP	54 seconds

9. Your rights

You have the following rights, which you can exercise free of charge: (a) obtaining information regarding the processing of your Personal Information and access to the Personal Information we hold about you; (b) requesting us to correct any mistakes in your Personal Information;(c) requiring us to delete your Personal Information in certain situations; (d) requesting us to restrict the processing of your Personal Information in certain circumstances; (e) receiving the Personal Information you provided to us in a structured, commonly used and machine readable format and or requesting that we transmit that data to a third party in certain situations; (f) objecting to your Personal Information being processed for direct marketing; (g) withdrawing consent; and (h) lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the General Data Protection Regulation.

10. Keeping your Personal Information secure

We have appropriate security measures to prevent Personal Information from being accidentally lost or used or accessed unlawfully. We limit access to your Personal Information to those who have a genuine business need to access it. Those processing your Personal Information will do so only in an authorised manner and are subject to a duty of confidentiality.

11. Changes to this privacy policy

We may change this privacy policy notice from time to time. An updated version will always be available on our website and we expect you to check this page from time to time to take note of any updates.

12. How to contact us

Please contact us at compliance@blueoip.com if you have any questions about this privacy policy, the Personal Information that we hold about you or would like to exercise your rights.

13. How to complain

We hope that we can resolve any query or concern you may raise about our use of your Personal Information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.