

HEDGEHOG PRIVACY POLICY

HEDGEHOG INVEST LIMITED (“Hedgehog”, “we”, “our”, or “us”) is committed to protecting and respecting your privacy.

1. OUR APPROACH TO PRIVACY

This privacy policy sets out how we collect, use and share data that identifies or is associated with you (“**personal information**”) as a result of you using our website at <https://www.hedgehog-invest.com/> and/or our mobile mobile applications available through various third party app stores (collectively referred to as the “**Sites**”) or otherwise interacting with us (whether online or offline).

2. ABOUT US

Hedgehog Invest Limited partners with existing owners of world class real estate assets to make fractional investment in real estate available to individual investors. We are registered in England and Wales under company number 13336465 and have our registered office at 167-169 Great Portland Street, 5th Floor, London, W1W 5PF. Hedgehog (FRN 961050) is an Appointed Representative of MJ Hudson Advisers Limited (FRN 692447) (“**MJ Hudson**”) which authorised and regulated by the Financial Conduct Authority of the United Kingdom to act as Principal Firm to Appointed Representatives. Hedgehog is the data controller of the personal information we hold about you.

Our ICO Registration Number is CSN8066209.

If you have any questions about this policy or our approach to privacy, please contact us at contact@hedgehog-invest.com.

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

The table at Annex 1 sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information.

More generally, we:

- (a) collect personal information that you voluntarily submit to us, such as your name, address and contact details, when you register with us, use our Sites and our services, or otherwise interact with us in the course of our business activities;
- (b) collect personal information you are required to provide us as part of our client onboarding procedures and financial suitability checks, such as address, tax residency, identification documents, investor profile information;
- (c) collect personal information about you from third parties, such as identity verification providers, reference agencies, diligence providers, social networks, public databases (where permitted by law), third party service providers, our advertising partners and our other business partners where we carry out joint business activities; and
- (d) may also collect certain personal information automatically, including in relation to how you access and use the Sites, technical information regarding the device you use to access the

Sites and the way in which you interact with our emails and newsletters (such as whether you open these).

We use the information we collect about you to correspond with you, perform our agreements with you, carry out marketing activities and our day-to-day business activities and operations (as described in greater detail in Annex 1).

We may link or combine the personal information we collect about you and the information we collect automatically. This allows us to provide you with a personalised experience regardless of how you interact with us.

We will indicate to you where the provision of certain personal information is required in order for us to provide you with certain features of the Site. If you choose not to provide such personal information, we may not be able to provide you with access to certain aspects of the Site.

4. DATA RETENTION

We will store the personal information we collect about you for no longer than necessary for the purposes set out at section 3 in accordance with our legal obligations and legitimate business interests.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

5. RECIPIENTS OF PERSONAL INFORMATION

We may also share your personal information with the following (as required in accordance with the uses set out in at section 3 above):

- (a) **Service providers and advisors:** we may share your personal information with MJ Hudson, and third party vendors and other service providers that perform services for us or on our behalf, which may include providing advertising, marketing, data hosting, CRM, IT system administration, banking, advertising, identity verification services, fraud prevention, tokenization services, and payment and analytics services.
- (b) **Token Issuers:** we may share your investor information with the token issuers and such other third parties as necessary to allow you to exercise your privileges in relation to a particular tokenized investment.
- (c) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.
- (d) **Law enforcement, regulators, governmental authorities and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with financial or tax reporting obligations; (ii) comply with the law and the reasonable requests of law enforcement; (iii) detect and investigate illegal activities and breaches of agreements; and/or (iv) exercise or protect the rights, property, or personal safety of Hedgehog or others.

- (e) **Other members of the Hedgehog group:** we may share your personal information with our affiliates (for example, where they provide services on our behalf) or where such sharing is otherwise necessary in accordance with the uses set out in Annex 1.

In addition, we may share your personal information with other third parties if you have provided your consent for us to do so.

6. ANONYMOUS DATA

We may anonymise and aggregate any of the personal information we collect about you (so that it does not directly identify you). We may use anonymised information for purposes that include testing our IT systems, research, data analysis, improving our Sites and developing new products and features. We may also share such anonymised information with others.

7. MARKETING AND ADVERTISING

From time to time, we may contact you with information about Hedgehog, including for the purposes of sending you marketing messages, inviting you to events we believe may be of interest to you and asking for your feedback.

We will only send you marketing messages if you have given us your consent to do so, unless consent is not required under applicable law (e.g., when marketing to corporate email addresses or in certain circumstances where we have a pre-existing customer relationship with you).

We also participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your online browsing history and your interests. To do this, we or our advertising partners may collect information about how you use or connect to the Sites, or the types of other websites, social media services, content and ads that you (or others using your device) visit or view or connect to our Sites so that we or our advertising partners may play or display ads on the Sites, on other websites, apps or services you may use, and on other devices you may use.

You can withdraw your consent or opt out of receiving further communications at a later date by clicking on the unsubscribe link at the bottom of our marketing emails.

8. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

Security. We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. For example, we use, as appropriate, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

International Transfers of your Personal Information. We may transfer your personal information to countries outside of the United Kingdom ("**UK**") and the European Economic Area ("**EEA**"), where:

- a) Our group members are located. For example, we share personal data with Hedgehog group members, located in the US.
- b) Our third party service providers have operations, including the US and BVI and other non-UK/EEA countries.

In some cases, this might result in your personal information being transferred to a country not recognised as having an adequate level of protection for personal data. These international transfers

of your personal information will be made pursuant to appropriate safeguards, such as standard data protection clauses adopted by the UK government or the European Commission. If you wish to enquire further about the safeguards used, please contact us using the details set out at the end of this privacy policy.

9. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

- (a) **Right of access.** You have the right to obtain access to your personal information.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- (c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- (f) **Right to object.** You have a right to object to the processing we carry out on the basis of legitimate interests in certain circumstances. You can also object to our direct marketing activities for any reason by clicking the "unsubscribe" link set out in any marketing communication you receive.
- (g) **Right to withdraw consent.** If you have provided consent to any processing of your personal information, you have a right to withdraw that consent.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this privacy policy.

If you are in the UK or EEA, you also have the right to lodge a complaint to your national data protection authority. The relevant data protection authority in the UK is the Information Commissioner's Office ("ICO"). Information on how to make a complaint to the ICO is available at www.ico.org.uk.

10. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies on the Sites for various purposes, including improving your experience of the Sites. For more information about cookies and why we use these, please refer to our Cookies Policy (available at: <https://www.hedgehog-invest.com/cookie-policy>).

11. LINKS TO THIRD PARTY SITES

Our Sites may, from time to time, contain links to and from third party websites, including those of other news publications and affiliates. If you follow a link to any of these websites, please note

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that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

12. CHILDREN

The Sites are not intended for or directed at children under the age of 18 years and we do not knowingly collect information relating to children under this age.

13. CHANGES TO THIS POLICY

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

14. NOTICE TO YOU

If we need to provide you with information about something, whether for legal, marketing or other business related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by placing a notice on the Sites.

15. CONTACTING US

Please contact our data privacy manager at contact@hedgehog-invest.com if you have any questions, comments and requests regarding this privacy policy.

This privacy policy was last modified on 6 May 2022.

ANNEX 1 – PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for processing
<p>Contact details (including name, email address, phone number etc.); account details (including username, password, communication preferences)</p>	<p>To register you for our services.</p> <p>Administration of account (including sending you information regarding purchases, changes to our policies, other terms and other administrative information).</p> <p>To allow you to post comments and feedback on the Sites.</p>	<p>Performance of a contract.</p> <p>Performance of a contract.</p> <p>Performance of a contract.</p>
<p>Correspondence and communications data (including details contained in your emails, messages and other communications with us); contact details (including name, email address, phone number etc.)</p>	<p>To provide you with information and materials that you request from us.</p> <p>To communicate with you as regards our Sites and services.</p>	<p>It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business.</p> <p>It is in our legitimate interests to communicate with you in respect of our services .</p>
<p>Contact details (including salutation, name, email address, address), ID information (including residency and date of birth), financial information (including net monthly income, banking details, tax residency), employment status (including full / part time) residential status and Investor suitability Assessment (including investment experience and goals, source of funds)</p>	<p>To assess your eligibility for an account with us based on our internal rules.</p>	<p>It is in our legitimate interests that we assess the suitability of individuals to create an account with us to protect us against the risk of individuals to carry out investor suitability assessment.</p>
<p>Contact details (including name and address), ID information (including identity documents, date of birth) financial information (background check, tax</p>	<p>To carry out “Know Your Client”, anti-money laundering and background checks and, where necessary, share this with other financial</p>	<p>Compliance with a legal obligation.</p>

residency),	institutions to comply with relevant laws.	
<p>Technical information (including IP address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, preferred language, activities, operating system and platform, and geographical location) and</p> <p>usage data (including clickstream to, through and from the Service, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), date and time pages are accessed, and website navigation and search terms used)</p>	<p>To administer the Site including resolving technical issues, troubleshooting, data analysis, testing, research, statistical and survey purposes.</p> <p>To help create and maintain a trusted and safe environment on the Service.</p> <p>To ensure that you are provided with marketing and advertising that is in line with your preferences.</p>	<p>Consent (to the extent required under applicable laws).</p> <p>Where consent is not required, such processing will be carried out on the basis of our legitimate interests to improve our services, provide a safe and secure environment for our customers, resolve issues for customers and develop and grow our brand.</p>
<p>ID information (including age), lifestyle preferences and employment details (including job title)</p>	To create lookalike audiences on social media platforms to better target our marketing.	It is in our legitimate interests to market our services in a targeted manner.
<p>Contact details (including name and phone number), telephone recordings</p>	To record your calls with our customer services team to comply with applicable laws.	Compliance with a legal obligation.
<p>Contact details (including name and address), card data (including card number, CVC etc.), transaction data (including transaction history, purchase amounts etc.)</p>	<p>To process and execute the transactions you enter in to.</p> <p>To carry out fraud checks.</p>	<p>Performance of a contract.</p> <p>It is in our and your legitimate interests that we carry out fraud checks to prevent you and us being defrauded.</p>

<p>Contact details (including name and post code), bank account details (including account number, sort code etc.)</p>	<p>To carry out investment distributions to investors.</p>	<p>Performance of a contract.</p>
<p>Account details (including username, password, communication preferences); technical data (including IP address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, preferred language, activities, operating system and platform, and geographical location)</p>	<p>To correct errors and problems with the Site.</p> <p>To protect the security of systems and data.</p>	<p>It is in our legitimate interests to monitor the Site to ensure that it functions properly and is secure.</p> <p>To comply with our legal and regulatory obligations.</p> <p>It is also in our legitimate interests to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us.</p>
<p>Contact details (including name, email address, phone number etc.)</p>	<p>To enforce legal rights or defend or undertake legal proceedings.</p>	<p>It is in our legitimate interests or those of a third party, i.e. to protect our business, interests and rights or those of others.</p>