

FORLAIS GROUP LTD | STATEMENT

Privacy Notice

How Forlais Group Ltd handles personal data through its public websites and business operations

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OWNER	Directors, Forlais Group Ltd
APPROVER	Forlais Group Ltd Board of Directors
CLASSIFICATION	Public

This document is a controlled governance instrument of Forlais Group Ltd. Uncontrolled copies are for reference only. The current version of record is held in the Forlais Governance Records and is authoritative.

1 Who we are

Forlais Group Ltd is the data controller for the personal data described in this notice.

COMPANY	Forlais Group Ltd
COMPANY NUMBER	16835488
REGISTERED OFFICE	45 Albemarle Street, 3rd Floor, London, W1S 4JL
WEBSITES	forlais.com and forlaisgroup.com
CONTACT	privacy@forlais.com

We are not required to appoint a Data Protection Officer under Article 37 of the UK GDPR. Data protection is led by the Directors of Forlais Group Ltd. You can reach them at privacy@forlais.com.

2 What this notice covers

This notice covers personal data we collect through:

- visits to forlais.com and forlaisgroup.com,
- contact you initiate with us by email, post, or any web form we make available,
- recruitment, supplier and adviser relationships,
- investor relations and due diligence,
- the Forlais Governance Records (governance pack) where they reference identifiable people.

The Evaesi platform is outside this notice. Before any public platform launch, platform-specific processing will need its own privacy notice.

The Forlais public websites are informational websites. They do not currently provide public user accounts, payment processing, model prompts, model outputs, or public API access.

3 Personal data we collect

3.1 From you directly

- Your name, business email and the content of your message when you contact us.
- Information you provide in a CV or covering letter when you apply for a role.
- Information you provide as a supplier, adviser or investor representative during contracting or due diligence.

Please do not send special category data or criminal offence data through the public website unless we specifically ask for it. If you include that kind of information in a message, CV or covering letter, we use it only where necessary to handle your enquiry or application, comply with law, establish or defend legal claims, or meet an employment-law obligation.

3.2 Automatically from your device

When you visit our public websites we receive limited technical information: your IP address, browser type and version, the page you arrived from, the pages you view, and the time of your visit. We use this only as needed to keep the sites running, protect them, and detect abuse. Cookies and similar technologies are covered in our Cookie Policy (FOR-STM-002).

3.3 From third parties

We receive personal data from public sources (Companies House, professional registers) and from people who introduce you to us (mutual contacts, advisers, investors). Where the UK GDPR requires it, and no exception applies, we tell you about the source of that data the first time we contact you or within one month.

4 Why we use your data, and the lawful basis under UK GDPR

Purpose	Lawful basis (UK GDPR Article 6)
Responding to your enquiry	Legitimate interest (Article 6(1)(f)): responding to people who contact us.
Recruitment and assessment of applications	Legitimate interest in finding suitable colleagues; steps towards entering into an employment contract on application (Article 6(1)(b)).
Supplier, adviser and investor relationships	Performance of a contract or steps towards entering into one (Article 6(1)(b)); legitimate interest in due diligence and record-keeping.
Running and protecting the public websites	Legitimate interest in operating secure websites.
Cookie preferences and optional analytics	Consent (Article 6(1)(a)) where consent is required; legitimate interest for strictly necessary security and service-operation records.
Compliance with law, including responses to lawful requests from regulators and the courts	Legal obligation (Article 6(1)(c)).

We do not use your personal data for automated decision-making with legal or similarly significant effects.

Where we process special category data that you choose to provide, we rely on an Article 9 condition where one is required, such as explicit consent, employment-law obligations, or legal claims. Where criminal offence data is involved, we process it only where UK data protection law permits it and the processing is necessary.

5 Children

The public websites are not directed at children under 13. We do not knowingly collect personal data from children under 13 through them. If you believe a child under 13 has provided personal data to us, please contact privacy@forlais.com and we will take appropriate steps to delete or limit it.

6 Who we share your data with

We share personal data only with parties that need it to support the purposes above. The current list of processors, subprocessors and supporting providers is published at FOR-STM-007 Subprocessor List.

We will also disclose personal data where we are required to do so by law, where a regulator or court of competent jurisdiction lawfully requires it, or where disclosure is needed to investigate suspected fraud or to protect the rights, property or safety of Forlais Group Ltd, our people or others.

We do not sell personal data.

7 International transfers

Some of our service providers are based outside the United Kingdom. Where personal data is transferred outside the UK, we rely on one of the lawful transfer mechanisms permitted by the UK GDPR, including UK adequacy regulations, the UK International Data Transfer Agreement (IDTA), or the UK Addendum to the European Commission's Standard Contractual Clauses, with appropriate supplementary measures.

You can request details of the safeguards in place for a specific transfer by emailing privacy@forlais.com.

8 How long we keep your data

Category	Retention
Enquiries and correspondence from website visitors	Up to two years from last contact, then deleted or fully anonymised.
Recruitment records for unsuccessful applicants	Twelve months from the close of the application, unless you agree to be kept on file for longer.
Supplier, adviser and investor records	Seven years from the end of the relationship, in line with Companies Act 2006 record-keeping.
Website technical logs	Up to ninety days.
Records subject to a legal hold or active complaint	Held for as long as the matter is open.

Where law or a funder contract requires a longer retention period, the longer period applies.

9 Your rights

Under the UK GDPR you have the right to:

- access the personal data we hold about you (Article 15),
- ask us to correct inaccurate or incomplete data (Article 16),
- ask us to delete data we no longer have a basis to hold (Article 17),
- ask us to restrict how we use your data while a query is being resolved (Article 18),
- receive your data in a portable form where we rely on consent or contract (Article 20),

- object to processing based on legitimate interest (Article 21),
- withdraw consent where we are relying on it, at any time,
- not be subject to a solely automated decision with legal or similarly significant effect, subject to the limits in Article 22.

Right to object. Where we rely on legitimate interest, you can object to that processing at any time. We will stop unless we have compelling legitimate grounds to continue or the processing is needed for legal claims.

To use any of these rights, email privacy@forlais.com. We respond within one month under Article 12(3). The period can be extended by two further months for complex requests; we will tell you within the first month if that applies.

We may ask for information needed to confirm your identity or to locate the data covered by your request.

There is no charge for a request unless it is manifestly unfounded or excessive.

10 How to complain

If you are not satisfied with how we have handled your personal data, please tell us first at privacy@forlais.com so we can try to resolve it. From 19 June 2026 you also have a statutory right to make a complaint to us under section 164A of the Data Protection Act 2018, inserted by the Data (Use and Access) Act 2025. Our Data Protection Complaints Procedure is published at FOR-STM-006 and we operate the same route voluntarily before that date.

You also have the right to complain to the Information Commissioner's Office.

ICO WEBSITE	ico.org.uk
HELPLINE	0303 123 1113
POST	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11 Changes to this notice

We review this notice at least once a year and whenever we make a material change to how we handle personal data. The current version is the version of record published on the Forlais public website and held in the Forlais Governance Records under FOR-STM-001. The version, issue date and review date are shown on the title page above.

Where a change is material, we will post a notice on the public website for at least thirty days before the new version takes effect.

12 Contact

EMAIL	privacy@forlais.com
POST	The Directors, Forlais Group Ltd, 45 Albemarle Street, 3rd Floor, London, W1S 4JL

13 Related instruments

- FOR-STM-002 Cookie Policy and Consent
- FOR-STM-003 Website Terms of Use
- FOR-STM-006 Data Protection Complaints Procedure
- FOR-STM-007 Subprocessor List

14 Change history

Version	Date	Change summary	Approved by
1.0	14 May 2026	First issue. Covers public website visitors, contacts, recruitment, supplier, adviser and investor relationships. Excludes Evaesi platform processing, which requires a separate notice before public launch.	Forlais Group Ltd Board of Directors

Approval

This document has been reviewed and approved as the current public version of record.

Role	Name	Approval date
Chief Research Officer	Oliver Cooper	14 May 2026
Chief Business Officer	Fraser Macdonald	14 May 2026