

Hilter UK Data Protection Act (DPA 2018) Compliance Policy

1. Purpose

This policy outlines how Hilter Real Estate Technologies Ltd. ("Hilter") complies with the requirements set out in the UK Data Protection Act 2018 ("DPA 2018"). It serves as a complement to our Data Protection Policy and Privacy Policy, demonstrating our commitment to responsible data handling, privacy, and transparency for all users, customers, employees, and partners operating within or in relation to the United Kingdom.

2. Scope

This policy applies to all personal data processed by Hilter that relates to individuals in the United Kingdom, whether that data is processed directly by Hilter or by third parties acting on our behalf.

3. Legal Basis for Processing

Hilter processes personal data under one or more lawful bases as defined in the UK GDPR and DPA 2018, including:

- Consent from the data subject;
- Contractual necessity;
- Legal obligations;
- Legitimate interests pursued by Hilter or a third party;
- Compliance with anti-money laundering (AML) and know-your-customer (KYC) regulations.

4. Data Protection Principles

Hilter adheres to the core principles of data processing under DPA 2018:

- Lawfulness, fairness, and transparency;
- Purpose limitation - Data collected for specified, explicit purposes only;
- Data minimisation - Only necessary data is collected and retained;
- Accuracy - Ensuring personal data is kept up to date;
- Storage limitation - Personal data is retained only as long as necessary;
- Integrity and confidentiality - Secure handling and protection of data.

5. Data Subject Rights (UK Residents)

UK data subjects have the following rights under the DPA 2018:

- Right to be informed;
 - Right of access;
 - Right to rectification;
 - Right to erasure (where applicable);
 - Right to restrict processing;
 - Right to data portability;
 - Right to object;
 - Rights relating to automated decision-making.
- Requests to exercise these rights can be submitted to Hilter's Data Protection Officer at support@hilter.com.

6. Data Security

Hilter implements robust physical, technical, and administrative measures to ensure personal data is protected against unauthorised access, loss, or misuse. This includes:

- Data encryption in transit and at rest;
- Role-based access controls;
- Ongoing security audits;
- Certifications such as ISO 27001, SOC 2 Type II, and Cyber Essentials.

7. International Data Transfers

Any transfers of UK personal data outside the United Kingdom are made in accordance with Chapter V of the UK GDPR, using:

- Adequacy regulations;
- UK Standard Contractual Clauses;
- Binding Corporate Rules (BCRs) where applicable.

8. Data Retention

Personal data is retained only for as long as necessary to fulfill the purpose for which it was collected and to comply with legal obligations, including AML, taxation, and audit requirements.

9. Breach Notification

In the event of a personal data breach affecting UK residents, Hilter will notify the UK Information Commissioner's Office (ICO) and the affected individuals where required by law, and within the regulatory timeframes.

10. Roles and Responsibilities

Hilter has appointed a dedicated Data Protection Officer (DPO) who is responsible for overseeing our DPA 2018 compliance:

Contact: support@hilter.com

Address: 55 Gilkes Cres, London, United Kingdom, SE21 7BP

11. Policy Review and Updates

This policy is reviewed annually and updated as necessary to reflect legal, technical, or operational changes.

Last Updated: June 2025