

LDSH STRATEGY PRIVACY NOTICE

LDSH Strategy Limited (**we, us or our**) respect your privacy and are committed to protecting your personal data.

This privacy notice aims to give you information on how we collect, process and look after your personal data, and in particular any data you may provide through, or as a result of your use of, our website (regardless of where you visit it from), when you contract with us for the provision of our products and services, when you supply us with products or services, or when you contact or otherwise engage with us. It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data including our customer privacy notice. This privacy notice supplements those other notices and is not intended to override them.

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect
- How we collect your personal data
- The purposes we use your data for
- Who we share your personal data with
- Security
- International transfers
- Data retention
- Your rights
- Changes
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Contact details

Telephone

+44 7549524506

Email

luis@ldshstrategy.com

For the purpose of data protection laws in the UK, LDSH Strategy Limited is the data controller and is therefore responsible for your personal data.

What information we collect

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes address (postal or other physical address), email address and telephone numbers, in each case these may be personal or business contact details.
- **Business Data** includes information about you relating to your business and your role within that business. Where you are a relevant stakeholder such as an investor, potential investor, prominent ophthalmologist, optometrist or health care practitioner, academic, staff at a grant provider or other funding body, staff at a relevant eyecare or ophthalmic company, start up founders and executives, or relevant connected business person (“Relevant Stakeholders”), this may also include information relating to your interests and requirements.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of the our products and/or services you have purchased from us.
- **Profile Data** includes your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website, products and services.

Personal data does not include data where your identity has been removed or which not associated with or linked to your personal data (anonymous data).

Please note that where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services that you request). In this case, we may have to cancel a service you have requested but we will notify you if this is the case at the time.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

How we collect personal data

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Business and Financial Data by filling in forms, through face to face interactions, by engaging in interviews with us and by corresponding with us via our website or by phone, post, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this type of data by using cookies, server logs and other similar technologies. Please see the 'cookies' section of this policy below for further details.
- **Third parties or publicly available sources.** We may receive Identity, Contact and Business Data about you from third parties and/or public sources such as Companies House, Linked In, third party websites, your employer, the websites of businesses you are connected with or from our or your other business contacts.

The purposes for which we use personal data

We will only use your personal data when the law allows us to. We may collect and process the personal data about you for the following purposes:

- **Contacting us** - when you contact us with an enquiry or to request information (including brochures and other hard copy materials), we will use your Identity and Contact Data to respond to you.
- **Our contract with you as a client**- we will use your Identity, Contact, Business, Financial and Transaction Data to register you as a client and to process and deliver products and services to you, including the management of payments, fees and charges. This is necessary for the purpose of performing our contract with you.
- **Our contract with you as a supplier** - we will use your Identity and Contact data to communicate with you in relation to the products and/or services that we receive from you. We will use your Financial Data to make payments to you.
- **Relevant Stakeholder engagement** – we will use your Identity, Contact, Business, Financial and Transaction Data to engage with you as a Relevant Stakeholder in relation to potential investment opportunities.
- **Advertising, marketing and public relations** - we may use the Identity, Contact, Technical, and/or Usage Data of our clients to form a view on what we think our clients may want or need, or what may be of interest to them and in doing so we will only send information that is deemed relevant to their use of our services. This is necessary for our legitimate interests in growing and developing our business including our products and services. Clients will receive marketing communications from us if they have requested information from us or purchased services from us and, in each case, have not opted out of receiving that marketing. We will however ask for express consent before we share personal data with any third party for marketing purposes. You can ask us to stop sending marketing communications at any time by contacting us.
- **Surveys and Interviews** – If you choose to complete a survey or interview that we use for research purposes we will retain the information that you provide in response to that survey. This is necessary for our legitimate interest in understanding our customers and developing our business and to informing our marketing strategy.
- **Administration** - we may use your Identity, Contact, Business and Technical Data for the purpose of protecting our business and our website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data. This is

necessary for our legitimate interest in running our business, the provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation, sale or group restructuring exercise, and for compliance with our legal obligations.

- **Website Analytics** - as you navigate our website, Technical and Usage Data may be collected automatically. We do this to find out things such as the number of visitors to the various parts of the website, and to help us to improve the content of the website and to customise the content or layout of the website for you, in accordance with our legitimate interests. This is necessary for our legitimate interest in defining types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
- **Fault reporting** - if you contact us to report a fault with our website, we will use the Identity and Contact Data provided for the purposes of rectifying that fault in accordance with our legitimate interests.
- **Recruitment** - personal data provided for an employment opportunity will be processed to allow us to process and evaluate the merits of that application in accordance with our legitimate interests.

We may also use personal data which you provide to us, where the law allows us to do so, as follows:

- To deal with and/or respond to any enquiry or request made by you prior to entering into any contract or agreement with us or as a result of such contract or agreement.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation, including the prevention of crime.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to connecting you with third parties at your or their request and/or sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Where we process personal data on the basis of a legitimate interest, as set out in this privacy notice, legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use

your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. This may include removing you from our marketing database where there has been no interaction between us over a prolonged period.

Who we share your personal data with

Your personal data will only be disclosed to those of our employees or workers that have a need for such access for the purpose for which it was collected. Your personal data will not be disclosed to any other individuals or other entities except in the following circumstances:

- Where you have agreed to us doing so in order to provide our services or it is otherwise necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract which may be entered into between us.
- Where you as a Relevant Stakeholder agree to us providing your personal data to a client of ours.
- On occasion, we need to hire other companies to help us to serve you better and in some of these cases we may need to share personal data that is necessary to perform tasks for us, such as our IT service providers and our professional and legal advisers.
- Where we are under a legal duty to do so in order to comply with any legal obligation.
- In order to protect the rights, property or safety of our business, our employees and workers, customers, suppliers and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.
- If we or substantially all of our assets are acquired by a third party, in which case personal data that we hold about our customers will be one of the transferred assets.

We require all third parties that process personal data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Security

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal data we collect. In addition, the access to and use of the personal data that we collect is restricted to our employees who need the personal data to perform a specific job role or activity. Where personal data is shared with third parties in line with this privacy notice responsible measures are used to protect your personal data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We urge you to take every precaution to protect your personal data when you are on the internet.

International transfers

The United Kingdom was, until recently a member of the European Economic Community and has in place provisions for the protection of personal data which are comparable with those of the European Economic Area.

We do not transfer personal data outside of the United Kingdom or European Economic Area, except where we are connecting two contacts, such as a Relevant Stakeholder with a client and we have obtained consent to do this (for example, as part of our Relevant Stakeholder engagement or business development contract we may introduce two contacts to each other).

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax or reporting requirements.

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the "unsubscribe" (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

If you wish to exercise any of your above rights, please email us using the address listed above.

You will not have to pay a fee to access your personal data or to exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

You can find more information about the cookies we use and the purposes for which we use them in the annex to this notice.

Other websites and links

Our website may contain links to other websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third party websites and are not responsible for their privacy notices or for the content, accuracy or opinions expressed in such websites. We do not investigate, monitor or check third party websites for accuracy or completeness and the inclusion of any linked website on or through our website does not imply approval or endorsement by us of the linked website.

If you decide to leave this website and access these third party websites, plug-ins and/or applications you do so at your own risk. We encourage you to read the privacy notice of every website you visit.

Changes to this privacy notice

This version was last updated in 19th January 2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Annex: Cookie Information

There are a number of different types of cookies which can be categorised as follows:

- **Strictly necessary cookies.** These are cookies that are required for the operation of a website. These essential cookies are always enabled because a website won't work properly without them. They include, for example, cookies that enable you to log into secure areas of websites, use a shopping cart or make use of e-billing services. You can switch off these cookies in your browser settings but you may then not be able to access all or parts of the relevant website.
- **Analytical or performance cookies.** These allow a website to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps site owners improve the way their 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 a website. This enables the site owner to personalise their content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to a website, the pages you have visited and the links you have followed. Site owners use this information to make their website and the advertising displayed on it more relevant to your interests. In some cases this information may also be shared with third parties for this purpose so that they can serve you with relevant advertising on their websites.

Currently we only use functional cookies on our website. The details of the cookies we currently use are set out below:

Cookie Name	Type of Cookie	Purpose	Expiration period
cmplz_banner-status	Functional	To store if the cookie banner has been dismissed	1 Year
cmplz_consented_services	Functional	To store cookie consent preferences.	1 Year

cmplz_functional	Functional	To store cookie consent preferences .	1 Year
cmplz_marketing	Functional	To store cookie consent preferences .	1 Year
cmplz_policy_id	Functional	To store accepted cookie policy ID .	1 Year
cmplz_preferences	Functional	To store cookie consent preferences .	1 Year
cmplz_statistics	Functional	To store cookie consent preferences .	1 Year

Please note in certain circumstances third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies:

- None at present

To opt out of being tracked by Google Analytics across all websites, you can visit <http://tools.google.com/dlpage/gaoptout>.

You can choose which cookies we set either through our cookie banner or by clicking on the “Manage consent” banner/button on the bottom right corner of the screen on our website (link [here](#)).

If you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

If you have any questions or concerns about our use of cookies, please send us an email at the address set out in our privacy policy above.