

Privacy Notice

Overview

This platform is provided in partnership with a third-party. The following privacy policy are those of the third party and are required in order for you to gain access to the Blackfinch portal.

This notice applies to the personal information Blackfinch, the organization that holds and processes. For the purpose of this notice and the services you can access through this portal, Blackfinch is the organization that you should contact if you have any questions or queries about how we manage your personal data. It explains what information we collect about you, how we will use the information, whom we will share it with and what measures we will take to ensure it remains private and secure. This notice will continue to apply even after your agreement with Blackfinch ends. You should read and understand this notice alongside the terms of services notice connected with use of this portal. Our services including the use of this portal are not directed to or intended for individuals under 18 years of age. By visiting this Website, you are accepting the practices described in this Privacy Notice.

When we refer to you or your, this means you, any authorized person on your account, anyone who looks after your investments for you (e.g., advisors, trustees, executors or those with a power of attorney).

When we refer to we or us, this means Blackfinch acting as the data controller of your personal information.

Information Collected

We only collect your information in line with relevant regulations and laws. This information takes many forms and includes records stored on computers and magnetic or optical media, data transmitted across networks or by fax, and information printed out or written on paper. It may also include information about how you interact with us, how often you access this portal, on which devices you use to access it along with the IP address you use.

Specifically, Blackfinch may obtain “Nonpublic Personal Information,” information about an individual obtained in connection with providing a financial product or service to the individual for personal, family or household purposes. As a private client or otherwise in an individual capacity e.g., relating to a trust or investment vehicle (depending on the jurisdiction) we collect the following types of personal data about you:

- Personal details, such as name, previous names, age, date of birth, gender, citizenship, occupation and marital status;
- Contact details, such as current and previous address, telephone, email, in some cases both private and work related contact details;
- Identification documents, such as your passport, copies which generally include a head and shoulders photograph from, as applicable, your passport, national identity card or driver's

license or other government issued ID, as required and permitted by applicable laws and regulations addressing due diligence and related matters;

- A government-issued personal identifier, such as depending on your country of residence, your Social Security Number, National Insurance Number, Tax File Number etc. (as permitted by law);
- Personal relating to any senior political figures (e.g. senior military or government official) to whom you are connected;
- Login credentials used to access this portal;
- Financial information, including source of wealth/funds, investment experience and objectives, risk tolerance and, in certain jurisdictions, representations required under applicable law or regulation concerning your financial resources.

You are not required to supply any of the personal data that we request. However, failure to supply any of the personal data that we request may result in our being unable to open or maintain your account, provide services to you or your company, discuss any other opportunities with you or deal with other matters.

The personal data we collect regarding you comes primarily from information that you submit to us or that is otherwise captured during the course of your relationship with us. For clients, we obtain personal data about you from the forms and documents used when you apply for an account with us, from your transactions with us and from your access to or use of our products and services. We also collect personal data when we monitor or record our communications with you or through use of certain technology as detailed further below.

Personal Data obtained from Other Sources

We also obtain your personal data from third parties who provide services to you such as your financial adviser, financial planner, dealer group, or investment manager. The personal data we obtain through these sources include personal details, contact details, identification documents, personal identifier, financial account information, and where permitted by applicable law and only to the extent needed information relating to political affiliations, trade union membership or criminal convictions.

Where you are an individual associated with a corporation or institution with which Blackfinch does business, your personal data will also be provided to us via that corporation or institution. Such personal data includes personal and contact details, identification documents and, where permitted by applicable law and only to the extent needed, information relating to political affiliations, trade union membership or criminal convictions.

Use of Collected Information

We will only use your information where we have your consent and where we have a legitimate and lawful reason for using it. These reasons may include any of the following where we:

- need to pursue our legitimate interests;
- need to process the information to enter into an agreement with you or carry out an instruction you give us;
- need to process the information to comply with a legal obligation;

- respond to questions and requests you raise with us;
- believe it is in the public interest to use your information, e.g., for the purpose of preventing or detecting crime; and
- according to the terms of use or permitted by law.

We welcome online feedback and provide forums for feedback on enquiries@blackfinch.com

Disclosure of Nonpublic Personal Information

We do not disclose any Nonpublic Personal Information to third parties, except as permitted or required by law, rules or regulations. We may disclose Nonpublic Personal Information to other financial institutions with which it has a joint marketing agreement or similar arrangement. Nonpublic Personal Information may be disclosed to affiliated and nonaffiliated third parties to enable them to provide business services for us, including marketing services, such as helping to evaluate requests for products or services, performing general administrative activities and/or assisting in processing transactions. The affiliated and nonaffiliated third parties are required to protect the confidentiality and security of this information and to use it only in accordance with our instructions. In the event that a customer decides to close an account or otherwise becomes an inactive customer, we will continue to follow its privacy and information security practices.

Cookies

What Are Cookies?

A cookie is a small text file that is stored on a user's computer, smartphone or device for accessing the internet. We may link the information we store in cookies to any personal information you submit while in our portal. Cookies save data about individual visitors to the website, such as the visitor's name, username, screen preferences and the pages within a portal visited by the user.

What Do We Use Cookies For?

We use cookies for a variety of reasons such as to identify as user's browser, determine preferences, help to efficiently navigate between pages during a browsing session, verify users and carry out essential security checks as well as enhance the user's experience.

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your computer, smartphone or device for an extended period of time. When a visitor revisits the website, we may recognize the visitor by the cookie and customize the visitor's experience accordingly. You can remove persistent cookies by following directions provided in your Internet browser's "help" tool.

If you reject cookies, you may still have access to our portal, but your ability to use effectively some areas of our portal may be hampered.

Managing Cookies Usage

You may block the installation of cookies by certain settings provided by your browser software. We would like to inform you, however, that in this case you may find using our portal may be hampered.

You can prevent the compilation of data (including your IP address) through cookies and website use by downloading and installing the browser plug-in available through the following link:
<http://tools.google.com/dlpage/gaoptout?hl=de>.

Portal Security

We protect your account information from unauthorized access, to the best of our ability, by placing it on the most secure portion of our website. To use this portal which accesses your personal and account information, you must enter your unique user name and password as well as any additional authentication methods we employ by responding with the details used to set up portal access. You should never share your username, password or other credentials with anyone. None of our other clients can access your data, and only a restricted set of our employees can access your data and can only do so in order to provide service to you. We upgrade and maintain our technology on an ongoing basis. Although the website you used to access this portal may link to some external sites, we are not responsible for the privacy practices of those websites.

Legal Basis for which we will use your Personal Data

We are not allowed to process personal data if we do not have a valid legitimate, legal basis for doing so. Accordingly, we, will only process and use your personal data:

- If necessary for taking steps to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract;
- To exercise and defend our legal rights anywhere in the world including in relation to any litigation, disputes or contentious matter we are involved in and/or to assist with investigations, complaints, regulatory requests, litigation, arbitration, mediation or requests from individuals;
- In order to comply with legal and regulatory obligations and requests, (including any legal or regulatory guidance, codes or opinions), applicable to us anywhere in the world;
- To carry out money laundering and conflict checks and for fraud, financial crime prevention purposes (and this may include consideration of information regarding political affiliations and criminal offences committed or alleged to have been committed); to verify your personal data we collect from you for such credit, money laundering and conflict checks;
- For reporting (including without limitation transaction reporting) to, and audits by, national and international regulatory, enforcement or exchange bodies.

Our Security Procedures

We maintain physical, electronic and procedural safeguards that are designed to protect Information. We are committed to the following principles to ensure the confidentiality and protection of Information: maintaining Information security, taking into consideration business requirements, risk mitigation, industry practice, and legal and regulatory requirements; protecting all forms of Information; implementing security measures that are effective, consistent and cost justified; effective implementation by management and staff for adherence to policies and procedures; monitoring advances in security technology to ensure that we are providing an appropriate level of privacy and safety; and, appropriate reporting of deviations from the policies and procedures or security breaches.

Our employees are required to protect the confidentiality of Information and observe policies and procedures in accordance with their job function. Employees may only access information when there is an appropriate reason to do so, such as to administer or offer our products and services and may be subject to disciplinary rules for noncompliance with policies and procedures. We may conduct business in various locations where the laws conflict with our established policies and/or procedures. In such instances, we will use commercially reasonable efforts to make appropriate modifications designed to enable our use and treatment of information to comply with local law.

Changes to this Privacy Notice

We reserve the right to modify or supplement this Privacy Notice at any time. Therefore, we recommend that you review this Privacy Notice, updated and posted on this portal, regularly for changes. The effective date of this Privacy Notice, as stated above, indicates the last date it was revised or materially changed.

Questions Regarding this Policy

Please direct any questions or complaints to Blackfinch, the data controller, concerning the use of your personal information by using the contact information below. We will investigate complaints promptly and diligently and endeavor to resolve any disputes quickly.

Blackfinch Investments Limited

1350-1360 Montpellier Court
Brockworth
England
Gloucester
GL3 4AH

01452 717070

enquiries@blackfinch.com

Data Subject Access Requests (DSAR)

If you wish to make a Data Subject Access Request to inform us of a change or correction to your personal information, request a copy of the information we collect on you, request deletion of your information or restrict the processing of your information, please use the contact details below.

enquiries@blackfinch.com