
PRIVACY NOTICE

BACKGROUND:

Fennech Financial Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

We are Fennech Financial Ltd, a Limited company registered in England under company number 10752052.

Our Registered Address is:

71-75 Shelton Street

Covent Garden

London

WC2H 9JQ

Registered with the Information Commissioners Office, reference number ZA547124.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK General Data Protection Regulation (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in

Part 11.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

Depending upon your use of our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data, or personal data relating to children, or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including name and title.	We collect this information directly from you, for example via e-mail or by asking you to complete an online form.

Contact information including business address, e-mail address and telephone number(s)	We collect this information directly from you, for example via e-mail or by asking you to complete an online form.
Business information including business name and job title.	We collect this information directly from you, for example via e-mail or by asking you to complete an online form
Profile information including preferences, role and user history (what tasks you have completed using our products and services and when)	We collect and log this information systematically as you use our products and services
Data from third parties including identity information, contact information and business information	As part of our sales and marketing activities, we may collect this information from social media (for example LinkedIn) or from other parties who recommend we contact you. If you are a user of our products and services, your employer may provide this information to us.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business; this includes communicating with customers, keeping records of our interactions with customers.	We use identity information, contact information, business information and data from third parties.	We have a legitimate interest in communicating with our customers representatives and keeping a record of those interactions.
Supplying our products and services. This requires us to identify individuals who use our products and services, administer their user rights, answer their queries and track their activity.	We use identity information, contact information, business information, profile information and data from third parties	We provide our products and services under a contract. This contract is typically signed with the users' employer. Our lawful basis for processing data in this case is therefore a legitimate interest in fulfilling our obligations under that contract
Sales and Marketing activities; communication with people who are not clients, or whose employers are not clients	We use identity information, contact information, business information and data from third parties.	We have a legitimate interest in communicating with individuals who may represent future clients or be able to recommend our products and services to others

With your permission and / or where permitted by law, we may also use your personal

data for marketing purposes, which may include contacting you by email and / or telephone and / or text message and / or post with information, news, and offers on our my products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name and title	Where this information relates to a user of our product and services, this will be kept as long as the customer is active or for 5 years from that date unless we are legally obliged to retain the data for longer. Where this information does not relate to a user of our products or services, it will be retained for no more than 3 years after its last use
Contact information including business address, e-mail address and telephone number(s)	Where this information relates to a user of our product and services, this will be kept as long as the customer is active or for 5 years from that date unless we are legally obliged to retain the data for longer. Where this information does not relate to a user of our products or services, it will be retained for no more than 3 years after its last use
Business information including business name and job title	Where this information relates to a user of our product and services, this will be kept as long as the customer is active or for 5 years

	<p>from that date unless we are legally obliged to retain the data for longer.</p> <p>Where this information does not relate to a user of our products or services, it will be retained for no more than 3 years after its last use</p>
Profile information including preferences, role and user history (what tasks you have completed using our products and services and when)	As long as the customer is active or for 5 years from that date unless we are legally obliged to retain the data for longer.
Data from third parties including identity information, contact information and business information	<p>Where this information relates to a user of our product and services, this will be kept as long as the customer is active or for 5 years from that date unless we are legally obliged to retain the data for longer.</p> <p>Where this information does not relate to a user of our products or services, it will be retained for 3 years after its last use</p>

8. **How and Where Do You Store or Transfer My Personal Data?**

We will store or transfer some of your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

We will store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).

We share your data with external third parties, as detailed below in Part 9, that are based outside of the EEA. The following safeguards are applied to such transfers:

We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#).

Where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in

Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 11 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for Administration, Supplying our Products and Services, and / or Sales and Marketing purposes. This includes subsidiaries.

We may sometimes contract with the following third parties to supply products and services.

Recipient	Activity Carried Out	Location
La Cite LP, a technology services company acting as data processor.	User administration and customer support (eg answering customer queries).	Quebec, Canada

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: dataprotection@fennech.com.

Postal Address:

71-75 Shelton Street

Covent Garden

London

WC2H 9JQ

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website:

www.fennech.com/aboutus/privacy

This Privacy Notice was last updated on 14 January 2021.