



Privacy Notice

Version: 0.4
Date: 12/04/2019

Privacy Statement Summary:

Welcome to FinTech Alliance Limited GDPR Privacy Policy which incorporates all of our website activities and all relevant processing of personal data.

FinTech Alliance Limited (“we”, “us” or “our”) are committed to protecting your privacy and your rights under the GDPR. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it, including how to update your data, and how to request that your data be deleted when applicable. By using our site, you consent to such use of your information.

For the GDPR and the Data Protection Act 2018 (the “Act”), we are the data controller. We are registered in England and Wales under company number 11779543. Our registered office is at The Chestnuts Brewers End, Takeley, Bishop's Stortford, England, CM22 6QJ.

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| Who will use my data? | Your data will be used by Fintech Alliance Ltd to provide the products and services you have requested, and only where you have given you consent, to share your information with carefully managed companies and third parties. Your data may also be used by advertisers and marketing companies to manage content delivered to you on our site. |
| What for? | We will store and process your data in order to provide access to our site and allow us to provide our information, products and services to you and to optimise our site to offer the best possible experience to you. Storing and processing your data will also allow us to work with our suppliers and other third parties and operate our business. |
| What will happen if I contact you? | <p>If you register on our site or contact us by email, social media, or any other means, we will use your information to send you the information you have requested and updates, offers and other information that we think you will be interested in.</p> <p>If you contact us for any other reason, for example when you raise a problem with our service, when you post material on our site, or respond to a campaign promoted on our site we will use your details to respond to your enquiry, provide our services to you, and meet any legal obligations.</p> |
| What data will be stored? | <p>We will store only the details necessary to provide our services to you and operate our business.</p> <p>All data is stored in the EU on our secure, dedicated servers and secure IT systems.</p> |
| What data will be shared? | We will not share your data with any third parties other than as described here and always as you would reasonably expect or where appropriate with your consent. We may share your information with any regulator or legal body that requests it. |
| How long? | Your data may be stored for up to 7 years after the end of our relationship, after which time, it will be deleted. |

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| | For more details please refer to our Date Retention and Erasure policy. |
| Who can access my data? | We will never sell, share or otherwise distribute your data to any other third party other than as described here and as required to provide our services to you and our customers, and to operate our business. |
| How is my data kept secure? | We have conducted a Data Protection Impact Assessment and completed all steps necessary to protect your data. |

About This Privacy Policy

This policy sets out how we will use and share the information that you provide to us. This policy describes your relationship with Fintech Alliance Ltd. The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Used lawfully, fairly and in a transparent way.
- It is collected only for lawful purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Adequate, relevant, and not excessive to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about or that you have enquired about.
- Kept securely.
- Processed in accordance with the rights of the data subjects
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection. This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Other loss and damage to Fintech Alliance Ltd, our partners, third parties, and data subjects as a result of a data breach or other data issue.

Who We Are And How To Contact Us

Fintech Alliance Ltd and is registered in UK with registration number: 11779543 and also with the Information Commissioner's Office, registration number ZA513803. The data controller can be

contacted in any of the following ways:

Email: info@fintech-alliance.com

Phone: 020 3795 2381

Website: www.fintech-alliance.com

Post: 20 St Dunstan's Hill, London EC3R 8HL

Who this privacy policy applies to

Fintech Alliance Ltd is a Digital Marketplace for the Fintech sector. This policy relates to users of our services and other data subjects that share their data with Fintech Alliance Ltd. Collection, processing, and storing of personal data is required in order to operate our business and to provide our services to you, our customers, and our partners,

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Job title
- Postal addresses
- Email Addresses
- Telephone numbers
- Your employment information
- Information about your company including number of employees, turnover, and other financial information
- Video / photos / other images of individuals
- Any other information relating to individuals as required to provide our services to you

What this policy applies to

This section describes the lawful basis for processing your data and applies to the information that you choose to provide us with or that you allow us to collect. To the extent permissible under applicable law, we collect and process information about you and any other party whose details you provide to us when you:

- Complete and fill in forms (such as the registration form) on our website: www.fintech-alliance.com (our "Site").
- This may include any information provided at the time of posting material, becoming a member or user of any of the services available through the Site or requesting further services or information. We may also ask you for information if you report a problem with our Site;
- Contact us; we may keep a record of that correspondence and your contact details which include; your name, job title, company, email and telephone number;

- The information you submit or upload to our Site when participating in the interactive features of our Site such as contributing to news, blogs, chat forums, online discussions or making online comments;
- Communicate with other registered users through our Site;
- Interact with us on social media;
- Provide your contact information directly to us at an industry event, networking event or a meeting
- As a business partner or a prospective business partner;
- As a job applicant, or a current or former employee
- Contact us by offline means, for example by telephone, SMS, post
- Visit our Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

We do not collect or process sensitive data about you other than where is absolutely necessary such as for employment purposes.

How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

| Purpose/Activity | Type of data | Lawful basis for processing |
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| To register you as a new user | (a) Identity, (b) Contact | Performance of a contract, with your consent and in our legitimate interest |
| To process and deliver the products and services you use on our site, providing information, recruitment services, managing payments, fees and charges, and to collect and recover money owed to us | (a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications | (a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us, (c) Necessary to operate our business |
| To manage our ongoing relationship with you which will include notifying you about changes to our terms, products and services, or privacy policy, to maintain our records | (a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications | (a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services |
| To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity, (b) Contact, (c) Technical | (a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation |
| To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising | (a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical | Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing |

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| | | strategy. To help target our social media campaigns. |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical, (b) Usage | Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy |
| In all other respects, to run our company, and provide our products and services to our customers. | (a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications | Necessary for our legitimate interest to run our business and provide our products and services to our customers. |

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding our services
- To provide our services to you
- To carry out our obligations arising from any contracts entered into between you and us including provision of services, and to respond to queries from you regarding those contracts
- To manage and administer the relationships between you and us
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us
- To obtain feedback from you regarding our services
- To manage our business and our relationship with you as a user, customer, supplier, or other third party.

If you contact us as a user or potential user, and according to your preferences, we will use your personal information to provide you with information about products and services that may be of interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services updates, including communications in relation to any services you use or changes to how we operate.

Where we inadvertently collect data about you we will respect your rights under GDPR as far as reasonably practical and technically possible.

How to change your preferences

We operate in line with EU GDPR (May 2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner’s Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website or email us to contact us to change your preferences at any time.

Scope of Agreement

By contacting us and submitting your personal data on this site or by supplying your data as required for us to provide products and services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy.

We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about products and services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing personal data including sensitive personal data, or where we reasonably operate in our legitimate interest, or when we have a contract with you, you can contact us to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

How we store and process your data

The data that we collect from you is stored on information technology systems located in the UK. Some data processing about web and email services is carried out on our behalf by a third party but at no time is your personal information shared. All data is stored on a 3rd party cloud-based server provided by Amazon Web Services. No data is stored locally.

Unfortunately, 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 Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your data may be stored for up to 7 years to ensure we have records of service, payments, and other interactions we have with you and to enable us to meet our statutory duties. In some cases your data may be stored for longer periods of time, please check our Data Retention and Erasure policy for details.

In order to provide or services to you we use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU, if this is the case, we will ensure precautions are in place to protect your data.

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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of

processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

You will only receive marketing communications from us if you have:

- Requested information from us or purchased goods or services from us
- If you provided us with your details on our website
- Provided your contact details to us in the course of doing business, trade shows, events, and other circumstances,
- Where you have not opted out of receiving marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR in the way we use and share your personal data. Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

You will not normally have to pay a fee to access your personal data (or to exercise any of the 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.

Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Our payment processing company Stripe – Stripe Payments Ltd. To view their privacy policy visit: <https://stripe.com/GB/privacy>
- Our communications equipment, mobile phone, network, and related services supplier
- Third parties who provide advertising and marketing services.
- Websites including social media we use to advertise our products and services
- Companies advertising vacancies, Recruitment companies, agents, and other employment bureaus should you choose to you submit your information or request details of vacancies.
- Other companies where you give your consent by choosing to submit your information
- Professional advisers including but not limited to: HR companies, compliance companies, lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance, accounting services, and other companies as required to run our business.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Other third parties we use to operate our business but only as required and as you would reasonably expect
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Under the GDPR, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

We may also disclose your personal information to third parties:

- If you consent for your badge to be scanned by any supplier/exhibitor at any FinTech Alliance event in which barcodes are displayed on the name badge. You have the right to refuse at all times;

- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our users will be one of the transferred assets;
- To enforce or apply our Terms of Use, or if we are under a duty to disclose or share your personal data to comply with any legal obligation;
- To protect our rights, property or safety, or that of our registered users or other third parties. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction as well as law enforcement agencies such as the Police.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Where we share your data with any third parties, we will take reasonable precautions to ensure that your data is protected including ensuring that any third party is GDPR compliant.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website may include links to third-party 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 these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you

find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept then you are free to leave our website, at any time.

We also use Google Analytics to monitor activity on our site [see below], disabling cookies in your browser will stop Google Analytics from being able to track your journey and details on this website.

Social Media

If you share our content through social media, for example by liking us on Facebook, following or tweeting about us on Twitter, or giving us a '+1' via Google Plus, those social networks will record that you have done so and may set a cookie for this purpose.

In some cases, where a page on our website includes content from a social network, such as a Twitter feed, or Facebook comments box, those services may set a cookie even where you do not click a button. As is the case for all cookies, we cannot access those set by social networks, just as those social networks cannot access cookies we set ourselves.

Log Files

Our systems automatically gather some anonymous information about visitors, including IP addresses, browser type, language, and the times and dates of webpage visits. The data collected does not include personally identifiable information and is used, as described above, for statistical analysis, to understand user behaviour, and to administer the site.

Advertisers and Third-party website

Third-party websites and advertisers, or advertising agencies working on their behalf, may use technology to send (or “serve”) the advertisements that appear on our website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy.

Our Site contains links to sites and services provided by third parties. To gain access to these sites and services, and in the course of your dealings with these third parties, you may need to provide personal information to them. We are not responsible for how they manage your personal information. You should read carefully the privacy statement of each site you access through our Site before you submit any personal information to those sites.

Legitimate Interests and DPIA

We have conducted a Legitimate Interest Assessment to ensure you are not adversely affected by our

marketing activity. We have completed a DPIA to analyse, identify, and minimise data protection risks and ensure we are able to meet our data protection obligations.

Contacting us, exercising your information rights and Complaints

If you any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact us at the above address. We will process SARs within 30 days, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities. If you remain dissatisfied you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire. SK9 5AF
www.ico.org.uk

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