

Privacy Policy

1. Introduction

At TruFin plc ("TruFin", "we", "us", "our") we recognise that it is important for you to understand how we use your personal data. Please read the following information carefully as it contains important information regarding the way in which we collect and use your personal data and what your rights are in respect of such data.

This policy explains how we use personal data about individuals that get in contact with us or with whom we have a relationship such as our clients, prospective clients and investors, visitors to our TruFin website (this/our "Site") and those individuals whose personal data we otherwise process in the course of our business.

We will only use personal data in ways that are described in this policy and in ways that are consistent with our obligations under applicable data protection laws.

2. Who we are

We are TruFin plc (a company registered in Jersey under company number 125245) with our registered office at 26 New Street, St. Helier, Jersey JE2 3RA. Our main trading address is 120 Regent Street, London, W1B 5FE.

For the purpose of applicable data protection laws, we are the "data controller" of your personal data (in other words, the organisation that determines how and for what purposes your personal data is used by us).

3. Personal data we may collect from you and how we collect it

We will collect personal data about you in different ways, including:

- when you interact with us by phone, email, letter, via email, or on our Site;
- when you utilise our Site;
- when you provide us with information before becoming a client, for example during the onboarding process;
- from third parties, for example when we carry out our routine checks on you before we accept you as a client; and
- when you sign up to receive marketing and/or newsletters from us;

The personal data we collect may include (but is not limited to) your:

- name;
- postal address;
- e-mail address;
- phone number (including mobile number);
- gender (and preferred salutation);
- date of birth;
- internet protocol (IP) address used to connect your computer to the internet;
- financial and credit card data; and
- national insurance number.

We will only ever ask you to give us (or otherwise collect) personal data which we need in order to provide you with the products or services that you have requested from us or to respond to your queries.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

4. Why and how do we use your personal data and what is our "lawful basis" for doing so?

Whenever we use your personal data, we need to make sure that we have established a valid legal justification (known as a "lawful basis") for that use of data. We have described the ways that we use your data and the associated lawful basis below. Where we rely on our legitimate interests, we will *always* make sure that we balance these interests against your rights.

How and why we use your personal data	What is our legal justification for processing your personal data
To carry out our obligations arising from any contractual agreement with you or your business and to provide you with the information you request.	We process your personal data for the purposes of fulfilling our contractual arrangements with you.
To measure how satisfied our customers are and provide customer services (including in connection with when you ask us questions by email, on the phone or otherwise).	Alternatively, in some scenarios, we rely on our legitimate interests as a business (for example, it is in our interests to measure customer satisfaction and troubleshoot customer issues).
To process payments and maintain accounts and records.	
To prevent or detect crime, fraud or abuses of our Site and to enable third parties to carry out related technical, logistical, research or other functions on our behalf related to these purposes.	In some circumstances we will use your personal data to enable us to comply with a legal obligation (for example, if we receive a legitimate request from a law enforcement agency). In other cases (such as the detection of theft, fraud or ensuring security of our Site) we will rely on our legitimate interests in keeping our employees and our Site secure and to prevent theft and fraud.
To send you newsletters, updates, and information that we think might interest you and to send you other promotional and marketing information via email. We use Mailchimp as the e-communications platform to send out the any e-newsletter, updates, and other news.	Unless we are contacting you in a business-to-business (" B2B ") capacity, we will only use your personal data to send you electronic marketing messages if we have consent from you to do so (or if you are an existing customer and have not opted out of receiving marketing materials). Where we send such communications to you in a B2B capacity or where an email is purely service
To measure or understand the effectiveness of	

How and why we use your personal data	What is our legal justification for processing your personal data
advertising we serve to you.	<p>related, we will rely on our legitimate interests to send these types of communication (our legitimate interest in marketing and advertising our products).</p> <p>You can amend your preferences or opt out from marketing communications by using the unsubscribe links within our marketing messages, or by contacting us at any time at the contact details set out at part 16 of this privacy policy below.</p>
To carry out market research or similar surveys.	
<p>To find out more about the visitors to our Site and our customer base as a whole (and not to find out more about you as an individual).</p> <p>We may use cookies to do this.</p>	<p>We have a legitimate interest to make sure that we are providing you with the information that we think is most relevant to you.</p> <p>We will not place cookies other than "strictly necessary" cookies on your device unless you have told us that you are happy for us to do so. For information on how we use cookies, please see our cookie policy available on our Site.</p>
To notify you about changes to our services and terms and conditions.	We process your personal data for the purposes of fulfilling our contractual arrangements with you. In some cases, we rely on our legitimate interests as a business to send you these updates.
For administrative or business purposes, where you contact us for a particular reason other than those set out above, such as to report problems with our Site.	We have a legitimate interest to respond to your contact for the purposes of administering our business.
If you are a job applicant, we will use your personal data to assess your suitability for the role and to make recruitment decisions. Unless you ask us not to, we will continue to process the application data (including CVs and any interview notes) of unsuccessful applicants for a period of 12 months.	<p>We have a legitimate interest in recruiting talent into our business and assessing candidates to ensure that we are making fair and appropriate recruitment decisions.</p> <p>We may process some of your data on the basis of a legal obligation that applies to us as a potential employer (e.g. in some territories, this may require us to process data relating to race, religion, gender or disability/health).</p>

5. What if you fail to provide personal data?

Please make sure you provide us with certain information when requested as if you don't we may not be able to perform the contract we have entered into with you (such as, to provide you with newsletters, updates and information). In this case, we may have to cancel the service but we will notify you if this is the case at the time.

6. Change of purpose

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose, we will explain our legal justification for doing so and we will provide you with any relevant further information. We may also issue a new privacy notice to you.

7. How we share your personal data

Third party suppliers and service providers involved in our contractual relationship with you

Like most businesses, we work with third party suppliers and service providers as part of the day to day operations of our business. Some of these trusted suppliers will process your personal data on our behalf and provide services to us such as website hosting.

We will always make sure that we require them to meet agreed standards for the protection of your personal data and they will only ever be allowed to use your personal data in order to provide us with services and not for their own commercial purposes. We require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with applicable data protection law.

Other scenarios in which we might share your personal data

- with government authorities or professional bodies, such as HM Revenue & Customs in the United Kingdom for tax purposes;
- with our professional advisors including tax, legal or other corporate advisors who provide professional services to us;
- with regulators, law enforcement or fraud prevention agencies, as well as our legal advisers, courts, the police and any other authorised law enforcement bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters etc;
- with analytics providers or search engines, including Google, that enable us to optimise and improve your experience on the Site (for more information on our use of cookies and similar technologies, please see our cookie policy available on our Site);
- in the event that we consider selling our business or assets we may disclose your personal data to any prospective sellers or buyers of such business or assets;
- in the event of any insolvency situation (e.g. administration or liquidation);
- if we, or substantially all of our assets, are acquired by a third party, in which case your personal data will be one of the transferred assets;
- in order to enforce or apply our purchase terms, website terms of use or other terms and conditions in place between us; and
- to protect the rights, property or safety of our employees, workers, customers or others. This includes exchanging your personal data with other companies and organisations (including without limitation the local police or other local law enforcement agencies) for the purposes of our employee, worker and customer safety, crime prevention, fraud protection and credit risk reduction.

8. How do we protect your personal data?

We take the security of your personal data very seriously and have put in place physical, technical, operational and administrative strategies, controls and measures to help protect your personal data from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice. We will always keep these under review to make sure that the measures we have implemented remain appropriate. You can obtain further information about these measures using the contact details set out at part 16 of this privacy policy below.

In addition, we limit access to your personal data to those employees and other third parties who have a business need to know in order to perform their job duties and responsibilities. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately (and as you will probably already know) 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.

9. How long do we keep your personal data?

We will retain your personal data for as long as we are providing you with the services outlined in any terms of business or any other contractual document or for as long as permitted or required for legal, regulatory, fraud prevention or our legitimate business purposes.

Personal data which is no longer required will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal data where applicable.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you. In this case, we may retain such information for a longer period without further notice to you.

10. Your rights in relation to your personal data

UK Data Protection Laws grant you a number of specific rights in respect of your personal data in addition to the broad and general right to have your data protected. We have set out some information in respect of each of those specific rights, below.

If you would like to exercise any of those rights (or if you have any queries about this policy or the way that we use your data, please contact us using the contact details set out at part 16 of this privacy policy below).

RIGHT	DESCRIPTION OF RIGHT
Information	A right to be informed about how your personal data will be/is being processed. This enables you to receive information about how we use your personal data. We have set this information out in this privacy policy.
Access	A right to access personal data held by us about you.
Rectification	A right to require us to rectify any inaccurate personal data held by us about

	you.
Erasure	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with your right to object, below).
Restriction	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Portability	In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Objection	A right to object to our processing of your personal data held by us where the processing of such data is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process personal data which override your rights or which are for the establishment, exercise or defence of legal claims.
Not to be subject to automated processing	A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. We do not make any decisions based on automated processing.
Withdrawal of consent and objection to marketing	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing about our services or products). You can object to direct marketing at any time.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes so that our records can be updated. We cannot be held responsible for any errors in your personal data in this regard unless you have notified us of the relevant change.

11. Where your personal data may be processed

We may transfer your personal data outside of the UK and the European Economic Area ("EEA") where local laws may not provide legal protection for personal data in the same way as is applicable in the UK or the EEA. Similarly, some of our trusted third-party suppliers may transfer data outside of the UK/EEA and wherever this is the case, we will implement appropriate safeguards to protect your personal data.

Whenever we send (or permit a third party to send) your personal data outside of the UK and the EEA, we will make sure that we take steps necessary to protect your data as required by applicable laws. For example, we may require the overseas recipient to enter into particular contract terms such as the UK IDTA.

12. Cookies

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

We also use Google Analytics which may collect and analyze personal data to optimize, and improve your experience on the Site.

For information on how we use cookies, please see our cookie policy available on our Site.

13. Third-party websites

Our Site may, from time to time, contain links to and from the websites of any partners, other business partner networks, advertisers and affiliates, or other sites. We may also include links to a number of social networks.

If you follow a link to any of these websites or social networks, please note that these have their own privacy policies and that we do not accept any responsibility or liability for how these websites or networks operate or use your personal data. Please check these policies before you submit any personal data to these websites or networks.

14. Changes to this privacy policy

We reserve the right to update or amend this privacy policy at any time, including where we intend to further process your personal data for a purpose other than that for which the personal data was collected or where we intend to process new types of personal data. We will place any updates here on this page. This privacy policy was last updated on 5 July 2022.

15. Complaints

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your data (our details are in the section immediately below). We will try to put things right.

However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to a data protection supervisory authority, which, if you are based in the UK, is the UK's Information Commissioner's Office ("**ICO**").

You can contact the ICO at: First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF; 0303 123 1113; or <https://ico.org.uk/>.

16. Contact

If you have any questions about this privacy policy or how we handle your personal data, please email contact@trufin.com.