

# Privacy policy for the FINPOINT platform

FINPOINT Limited ("FINPOINT") takes data protection and privacy very seriously. This privacy policy explains how FINPOINT collects, processes and uses personal data which FINPOINT obtains through the utilisation of the FINPOINT platform (the "platform"). By using the platform, platform users agree to the provisions of this privacy policy.

## 1. Applicable data protection regulations

FINPOINT shall collect, process and use personal data solely in compliance with the provisions of this privacy policy and of the applicable data protection regulations including but not limited to the Data Protection Act 1998 (the "Act")

Information that you submit to FINPOINT will not be shared with third party financial institutions without your consent. FINPOINT will require such financial institutions to respect your confidential information (please see our [Confidentiality Agreement](#) for the terms upon which we will release your confidential information) and not to share it but FINPOINT cannot guarantee that your data will be processed by these financial institutions in accordance with the Act. You should read the relevant financial institution's privacy policy before you permit us to disclose your data to them.

## 2. Collection of personal data

For registration on the platform and in order to grant platform users access to the platform, FINPOINT needs certain personal data. This personal data includes, among other things, the user's e-mail address, name, telephone number ("personal data"), and, under certain circumstances, and with his or her consent, information on his or her background, qualifications and experience, which may be considered "sensitive personal data" under the Act (for the purposes of this privacy policy "personal data" includes any sensitive personal data). . Personal data means data relating to a natural person, who registers a company, financial institution or service provider (as defined in the terms of use for the platform, which are provided on the platform) on the platform and, under certain circumstances, the data of the respective authorised representative(s) of such companies, financial institutions or service providers (in the context of this privacy policy collectively the "platform users").

FINPOINT collects personal data as follows:

- Personal data provided by the platform users: In the context of registration on the platform or on establishing a contact with FINPOINT for the purpose of gaining information on FINPOINT, the platform or its services.
- Personal data collected automatically with the assistance of "cookies": As soon as platform users access the platform, FINPOINT collects and stores specific personal data with the help of "cookies". More details on "cookies" are provided in [clause 6 below] [our Cookie Policy].
- Personal data received from third parties: Under certain circumstances FINPOINT may receive personal data from third parties with whom FINPOINT cooperates for the purpose of identifying and authenticating platform users.

FINPOINT collects anonymous information about visits to the site. Once a platform user registers with the site, the anonymous information we hold about that user's previous visits can be matched with that user's account.

## 3. Use of personal data

FINPOINT shall employ the personal data in compliance with the confidentiality obligation contained in the terms of use for the platform and only use and retain such data as far and as long as this is necessary for the purposes of platform utilisation, FINPOINT's rendering of services on the platform and for keeping platform users informed of FINPOINT services. This shall include the following purposes, among others:

- Surveillance and improvement of the platform and services rendered by FINPOINT.
- Verification and authentication of the platform users' identity.
- Creation and operation of platform access.
- Prevention or detection of fraud and other criminal offences or abuse of the platform.
- Creation of anonymous statistics with the help of personal data (clause 7 of this privacy policy provides more details on statistics).
- Tailoring of marketing communications to ensure that the most relevant information reaches platform users.

FINPOINT shall store the personal data only on servers located inside the European Union.

#### **4. Transmission of personal data**

Except as outlined in this privacy policy FINPOINT shall not transmit any personal data to third parties unless this is necessary for the purpose of rendering the service and performing its contractual obligations to the respective platform user or is prescribed by applicable data protection regulations or competent data protection authorities. FINPOINT may make personal data available to the following third parties:

- Companies affiliated with FINPOINT.
- Other platform users, including financial institutions, as far as a transmission of the personal data is necessary for the purpose of rendering the services on the platform and the respective platform user has provided his or her personal data for such purposes.
- Third service providers, as far as this is necessary to verify and authenticate the identity of platform users by FINPOINT.
- Other third parties, as far as this is necessary to render the services requested by the respective platform user on the platform.
- The competent data protection authorities as far as FINPOINT is obliged to disclose the personal data to the respective data protection authority.

FINPOINT endeavours to publish only anonymous information on its platform and will only disclose a platform user's name with the platform user's consent. Submission of information is voluntary and FINPOINT is not responsible for platform user's loss of anonymity through disclosures that they make through their use of the platform. Platform users should be aware that various pieces of anonymous information posted and read together could lead to their being identified by other users and third parties and FINPOINT accepts no responsibility for loss of anonymity in these circumstances.

#### **5. Websites of third parties**

The website of the platform may contain links to websites of third parties whose data protection standards may differ from the provisions of this privacy policy. Platform users should read the respective privacy policies of these third-party websites attentively, as FINPOINT has no control over personal data that is transmitted to these third-party websites or collected by them. FINPOINT shall accept no liability for the use of personal data by these third parties.

#### **6. Data security**

FINPOINT complies with high data security standards to protect personal data against unauthorised access and FINPOINT has taken suitable technical and organisational measures for data protection. However, FINPOINT wishes to point out that in the case of communication with FINPOINT by standard e-mail the transmitted contents cannot be encrypted. Platform users should be aware of this when they transmit personal data or other sensitive information by standard e-mail.

Please protect any password and login details that you use to register with our site. You are responsible for any information submitted or activity undertaken during a session accessed with your details.

#### **7. Cookies**

A cookie is a small text file that a website stores on the platform user's computer through the

platform user's browser, so that the website can identify the respective platform user when s/he uses it again. [For more information please see our Cookie Policy online.](#)

## **8. Statistics**

For the purpose of creating anonymous statistics FINPOINT shall have the right to combine the personal data of a platform user in an anonymised form with anonymised personal data of other platform users in order to obtain new anonymised data sets. FINPOINT shall have the right to make the anonymous statistics created in this manner available to third parties.

## **9. Rights of the platform users**

Platform users are not obliged to make all the personal data requested by FINPOINT available to FINPOINT. The transmission of personal data to FINPOINT shall be voluntary. However, without certain personal data FINPOINT can neither register platform users for utilisation of the platform, nor create a user account nor grant access to the platform.

Platform users have the right to request information about their personal data stored by FINPOINT or demand access to such data. FINPOINT has the right to demand proof of identity from the corresponding platform users before granting access to personal data. FINPOINT shall correct inaccurate personal data at the platform user's request. Platform users shall immediately inform FINPOINT of any changes to their personal data.

## **10. Amendment of this privacy policy**

FINPOINT has the right to change this privacy policy in whole or in part from time to time. Platform users should regularly review the latest version of the privacy policy shared on the website by FINPOINT, in order to be informed of possible amendments.

## **11. Data secrecy**

All in-house and external staff members of FINPOINT are obliged to observe data protection measures required by the Act.

## **12. Responsible body and contact**

The responsible body for collecting and processing personal data according to the provisions of this privacy policy is FINPOINT Limited, Davidson House, Forbury Square, Reading, Berkshire, RG1 3EU.

Any questions, suggestions or complaints related to this privacy policy or the utilisation of personal data by FINPOINT shall be addressed to FINPOINT's data protection officer using the contact data mentioned above.