ACREBOND

Privacy Notice

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This privacy notice for Acre Bond Ltd (`Acrebond', 'we', 'us', or 'our',), describes how and why we might collect, store, use, and/or share ('process') your information when you use our services ('Services'), such as when you:

•Visit our website at https://www.acrebond.co.uk or any website of ours that links to this privacy notice

• Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns?

Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at contact@acrebond.co.uk

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Acrebond and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We may process sensitive personal information, when necessary, with your consent as permitted by applicable law, or otherwise with your consent (if applicable).

Do we receive any information from third parties? We may receive information from public databases, marketing partners, any provider of products which are connected to any Services, any advisor or party who is acting on your behalf, social media platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law and our legal obligations. We may also process your information for other purposes with your consent. We process your information only when we have a valid lawful reason to do so.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties.

How do we keep your information safe? We have technical and organisational processes and procedures in place to protect your personal information. However, no electronic transmission over the

internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.
What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.
How do you exercise your rights? The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us directly or indirectly.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your direct or indirect interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include (but not necessarily limited to) the following:

• Names • Contact Details (e.g. Phone Numbers, Email Addresses and Mailing Addresses) • Residential Addresses • Nationality • Tax Residency Information • Sort Code and Account Numbers • Contact Preferences • Identification Documents (e.g. Driver Licence or Passport) • Acrebond Usernames

• National Insurance Number • Source of Funds • Employment Information (e.g. Role, Industry, Job Titles, Status and Income) • Third party products or our products that you have shown or have an interest in

Special Category and Sensitive Information. When necessary, where we have a lawful right to do so, or otherwise when we require your consent (as applicable), we process the following categories of special category or sensitive information:

• Financial Data • Information revealing race or ethnic origin • Information revealing political opinions • Information revealing health data • Social security numbers or other government or tax identifiers

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information in a timely manner. You must also immediately advise us in writing if any appointed financial advisor of yours is no longer appointed by you to have access to your personal information.

Information automatically collected

In Short: Some information -- such as your Internet Protocol (IP) address and/or browser and device characteristics -- is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

• Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

• Device Data. We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application

identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information. • Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected from other sources

In Short: We may collect limited data from public databases, marketing partners, your advisors who you have appointed on your

behalf, our affiliated companies and other outside sources.
In order to enhance our ability to provide relevant marketing, offers, and products and our Services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, product providers that you have taken up from our Services, your professional advisors, our affiliated companies and from other third parties. This information includes monies you may want to save or invest, mailing addresses, job titles, email addresses, phone numbers, residential addresses and other contact details, intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion and the administration of the Services and any related product.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process your information to provide, improve, and administer our Services, communicate with you and/or your appointed advisors, including for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

• To facilitate account creation and otherwise manage user accounts. We may process your information so you (and/or any of your appointed advisors) can create and log in to your account, as well as keep your account in working order.

• To verify your identity. We may process your information to verify your identity during onboarding as part of our Know-Your-Customer (KYC) process and to comply with antimoney laundering and other laws and regulatory requirements.

• To deliver and facilitate delivery of services to the user. We may process your information to directly and/or indirectly provide you with the requested service.

• To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.

• To send administrative information to you. We may process your information to send or make available to you and/or your appointed advisors, details about our products and services, changes to our terms and policies, and other similar information.

• To fulfil and manage your orders, requests or instructions. We may process your information to fulfil and manage your orders, requests, instructions, payments, withdrawals, and other applicable matters, made through the Services.

• To request feedback. We may process your information when necessary to request feedback and to contact you about your use of our Services.

• To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud and anti-money laundering monitoring and prevention.
• To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them.
• To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
• To provide your information to your appointed financial advisors. We may process your information for your appointed financial advisors where you have instructed them to act on your behalf. You must immediately advise us in writing if any appointed financial advisor of yours is no longer appointed by you to have access to your personal information.

Automated Decision Making Process

We may use automated systems to make certain decisions about you without human involvement. These automated decision making processes help us operate our services efficiently, consistently, and in line with legal and regulatory requirements. These automated processes use information you provide to us or information we obtain as part of our checks. For instance:
• deciding whether we are able to offer you an Acrebond account or specific products; • assessing the level of risk associated with onboarding and ongoing account activity; and • monitoring accounts to detect fraud and other financial crime.
You may have the right to receive information about how we make these decisions, to request human review of a decision, and to challenge the outcome where you believe it is incorrect.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. lawful basis) to do so under applicable law, to (for example) to provide you with products and Services, to enter into or fulfil our contractual obligations, to protect your rights, or
to fulfil our legitimate business interests or comply with applicable law. Where there is no existing lawful basis, then we will only do so with your consent, in accordance with applicable laws,
The UK GDPR requires us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following lawful bases to process your personal information:
• Performance of a Contract. We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
• Legitimate Interests. We may process your information when we

believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to: o Analyse how our services are used so we can improve them to engage and retain users o Diagnose problems and/or prevent fraudulent activities o Understand how our users use our products and services so we can improve user experience
• Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement or crime prevention or investigative related body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved or ordered by a court of competent jurisdiction to do so.
• Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.
• Consent. Other than the grounds stated above, we may otherwise process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

4. WHEN AND WITH WHOM DO WE SHARE YOUR

PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following categories of third parties. Vendors, Consultants, advisors and Other Third-Party Service Providers. We may share your data with your appointed professional financial advisors whom you have authorised to receive your personal information on your behalf. We may also share your data with third-party vendors, service providers, contractors, or agents ('third parties') who perform services for us or on our behalf or otherwise provide savings or investment related accounts which you wish to or will use and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. They will, depending on their role, only use your personal
information either under terms we have agreed with them, or otherwise in compliance with applicable law. The categories of third parties we may share personal information with are as follows:
• ID Authentication and Verification Tools • Cloud Computing Services • Data Storage Service Providers • Payment Processors • User Account Registration & Authentication Services • Providers of savings accounts or other investments • Regulatory or Government bodies (e.g. HM Revenue & Customer, the Financial Conduct Authority or National Crime Agency)

We also may need to share your personal information in the following situations:
• With any affiliate company of Acrebond who provides services to us. • We may share or transfer your information in connection with, or during negotiations of, any
merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Do we use your information for marketing?
We may use your personal information to send you marketing communications about our insights, products, or services that may be of interest to you where you have given your consent to receive such communications.
You may opt out of receiving marketing communications at any time by:
• Using the unsubscribe option included in our marketing communications; or • Contacting us using the details in section 12
Please note that, even if you opt out of marketing communications, we will continue to send you service related communications where necessary. These may include important information about your account, changes to our terms and conditions, or updates to applicable policies.
We may appoint digital marketing agents to conduct marketing activity on our behalf. Where this involves the processing of personal information, such providers act as our data processors and are required to process information only in accordance with our instructions and applicable data protection laws.,such activity may result in the compliant processing of personal information.

Do we disclose your information overseas?
In Short: We may transfer your personal information to organisations outside the United Kingdom. Where we do so, we ensure appropriate safeguards are in place to protect your information in line with UK data protection law.
We may transfer your personal information to recipients (such as third parties) located outside the United Kingdom for the purposes described above. Where we transfer personal information outside the UK, we ensure that the transfer is made in accordance with the applicable UK privacy laws and that appropriate safeguards are in place. This may include:
• Transferring personal information to countries that have been recognised by the UK Government as providing an adequate level of protection for personal data;
• Using approved contractual safeguards, such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses; or
• Implementing additional technical or organisational measures where required to protect your information.

5. DO WE USE COOKIES AND OTHER TRACKING

TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information. We may use cookies and similar tracking technologies (such as web beacons and pixels) to access or store information. If we use non-essential cookies or other tracking technologies, we will obtain your consent before storing them on your device.

Most web browsers are set to accept cookies by default. If you prefer, you can choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). Unless otherwise required by law, we do not keep your personal information for longer than sixty (60) months past the closure or termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of technical and organisational security measures.

We take appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures are designed to ensure a level of security appropriate to the nature of the personal information we process and the risks involved.

Examples of the security measures we use include:

• Training staff on their data protection obligations and taking appropriate action where breaches of those obligations occur;

• Restricting access to personal information on a strict need to know basis; • Ensuring that only authorised personnel are permitted to access personal information; • Using technical security measures such as firewalls and encryption to protect our systems and websites; and • Requiring passwords and other access controls to protect databases and systems containing
personal information.

Despite our safeguards and efforts to secure your information, no

electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data that we may have collected from children under age 18, please contact us at contact@acrebond.co.uk.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In the United Kingdom (UK), you have rights that allow you greater access to and control over your personal information.

You have certain rights under applicable data protection laws. These may include the right to:

• Request Access. You may request access to, and a copy of, the personal information we hold about you.

• Request Rectification. You may request that we correct or update personal information we hold about you where it is inaccurate or incomplete.

• Request Erasure. You may request that we delete your personal information, provided that we are not required or otherwise permitted by law to retain it.

• Request Objection. You may object to, or request that we restrict, the processing of your personal information, where we do not have a legal obligation or other lawful basis to continue processing it.

• Withdraw your Consent. You may withdraw your consent at any time where we rely on your consent to process your personal information. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the continued processing of your personal information conducted in reliance on lawful processing grounds other than consent.

• Not be Subject to Automated Decision Making. You may request information about automated decisions that have a legal or similarly significant effect on you and, where applicable, request human review of such decisions.

• Request Data Portability. You may request that your personal information be provided to you or transferred to a third party, where applicable.

How do I exercise my rights?
You can exercise any of these above rights by contacting us by using the contact details provided in section 12 below.
We will consider and respond to all request in accordance with applicable data protection laws and the basis upon which we are holding or processing your personal data.
If you believe that we are unlawfully processing your personal information or you have concerns about the way in which we are processing your personal information, you have the right to complain to the regulator. Our regulator is the Information Commissioner's Office (ICO), who can be contacted at ico.org.uk/global/contact-us.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-NotTrack ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

11. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws or otherwise. We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification or otherwise by making it available to you. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), by email at contact@acrebond.co.uk, or by post to: The DPO Acre Bond Ltd
Lily House, 1st Floor, 11 The Shrubberies, George Lane, London, E18 1BD