

## **This notice will explain how we look after your personal data.**

BrickVest is committed to protecting your personal data and respecting your privacy. This notice will inform you about how we look after your personal data and protect your privacy, in line with your legal rights.

BrickVest is made up of different legal entities. This privacy notice is issued on behalf of the BrickVest group, so when we mention “BrickVest, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the BrickVest group responsible for processing your data. BrickVest Markets Ltd is the controller responsible for this website.

All changes to this policy will be posted here. You should visit this page regularly to stay up to date.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **INFORMATION WE MAY HOLD ABOUT YOU**

We may collect and process the following data about you:

1/ information you provide when you fill in forms on our website at <https://brickvest.com> (“our site”), including information you provide when you register as a user;

2/ any information you have provided for credit and fraud prevention purposes;

3/ any information you have submitted in connection with applicable legal and regulatory requirements;

4/ copies of correspondence you send to us (including by post, email or through our site);

5/ your responses to surveys or questionnaires we ask you to complete;

6/ details of any transactions you carry out on or through our site;

7/ details of your visits to our site (including traffic data and data in relation to the resources you access); and

8/ information that we collect about your computer, including its IP address.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## HOW WE USE YOUR INFORMATION

We use information held about you to:

1/ ensure the content of our site is presented in the best way for you and your computer or other device you may use to access our site;

2/ provide you with information about opportunities or services that you request or which we consider may be of interest to you (subject to the following section of this policy);

3/ perform our obligations under contracts between you and us;

4/ comply with our legal and regulatory requirements (including credit and fraud prevention requirements), requests and related disclosures, including reporting to or being audited by national and international regulatory, enforcement or exchange bodies;

5/ allow you to use the various features of our site;

6/ protect your account and limiting access to your account; and

7/ allow third parties to contact you about goods or services you might be interested in (subject to the following section of this policy).

## MARKETING COMMUNICATIONS

We will only send you marketing communications by electronic means (e-mail or text) if those communications relates to goods, services or opportunities which are similar to those that you have previously purchased, invested or expressed an interest in or if you have consented to us contacting you in this way. We will only permit third parties to send you marketing communications by electronic means if you have consented to this.

You have the right to ask us not to use your information for marketing purposes or passing it on to third parties for them to use for marketing purposes. You can do this through the Account Settings page within your BrickVest account, by clicking on Notifications and ticking the relevant box. If you have any problem doing this, you can contact us at any time at [privacy@brickvest.com](mailto:privacy@brickvest.com).

## STATISTICAL INFORMATION

We may aggregate information about you with information about other users of our site to create statistical data about users. This is statistical data that does not identify you and we may distribute any such aggregate information to third parties we work with.

## SHARING YOUR PERSONAL INFORMATION

We will only share personal information that we hold about you to third parties:

- 1/ who are companies within our group of companies;
- 2/ whose services we need to perform the contract we are about to enter into or have entered into with you;
- 3/ where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- 4/ to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them; or
- 5/ where we need to in order to comply with a legal or regulatory obligation.

## COOKIES

Cookies are small files placed on your device when you visit a website. We use cookies to recognise you and your preferences, improve the performance of our site and to create statistical data.

Cookies generally fall into one of the following categories:

- 1/ “strictly necessary” or “essential” cookies which are cookies that are needed for the website and its features to work properly
- 2/ “performance” or “analytics” cookies which collect information about how visitors use a website to create aggregated, anonymous information that does not identify the visitor, but may help to improve the performance of the website
- 3/ “functionality” or “personalisation” cookies which allow the website to remember you and provide a more personalised service
- 4/ “marketing” or “targeting” cookies which are used to deliver content relevant to you.

Some cookies remain on your device between your browsing sessions, for example those that allow a site to retain your log-in details, if you have requested that.

Upon your first visit to our site, depending on your geographic location and the rules pertaining to it, you may be offered the option to accept all cookies or only certain types. Disabling cookies may make certain site features unavailable. You can update your choice at any time, by clicking on the cookie-shaped icon located at the bottom left of the website.

You can also disable cookies across the board by changing the settings on your browser, but doing so might mean you are unable to use certain features of websites.

## DATA 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

## YOUR LEGAL RIGHTS

This section explains the rights you have under data protection laws with respect to how your personal data is held and used by us. If you wish to request to exercise any of these rights, you can contact us using the details set out at the end of this privacy notice.

You have the right to withdraw your consent to us processing your personal data at any time. This will not affect the lawfulness of any processing of your

personal data that we carried out before your withdrawal. If you choose to withdraw your consent to us processing your personal data, we may not be able to perform your contract with us for the relevant service or provide other products or services to you.

You have the right to access the personal data we hold about you, free of charge.

You have the right to ask us (and third parties to whom we transfer your personal data) to rectify your personal data if it becomes inaccurate. In order for us to do so, you must inform us of any changes to your personal data so that we can keep it up to date.

You have the right to ask us to erase your personal data where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions. We may not be able to perform your contract with us for the relevant service or provide other products or services to you if you ask us to erase your personal data.

You have the right to restrict our further processing of your personal data. Where processing is restricted, we can still store your personal data, but we may not use it further.

You have the right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you believe our processing of your personal data does not comply with data protection laws, you can make a complaint to the UK Information Commissioner's Office: [ico.org.uk/](https://ico.org.uk/).

## WHERE WE STORE YOUR DATA

Data we collect from you may be transferred to and stored in destinations outside the European Economic Area ("EEA") and may be processed by staff operating outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.



- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## CONTACTING US

If you have any questions or comments on this policy, including any requests to exercise your legal rights (as set out above), please use the contact details set out below:

Full name of legal entity: BrickVest Markets Ltd

Name and title of Data Protection Officer:

Email address: [privacy@brickvest.com](mailto:privacy@brickvest.com).

Postal address: 166 Sloane Street, SW1X 9QF London, United Kingdom

