

OUR PRIVACY NOTICE

Introduction

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from you or about you. It applies to all our products and services, and any instances where we collect your personal data.

About us

Bankers without Boundaries is a company registered in England and Wales (registration number 11418661), whose registered address is at, 119 Marylebone Road, London, NW15PU is authorised and regulated by the Financial Conduct Authority (No. 953637)

For the purposes of the General Data Protection Regulation ('GDPR'), Bankers without Boundaries ("BwB") is the data controller under the Regulation, which means that we determine the purposes and means of processing personal data.

If you have any questions in relation to this privacy policy or how we collect, use or store your personal information, you can contact us by phone at: +44 7836677992, by post at 119 Marylebone Road, London, NW15PU or by email at: stephen.pack@bwb.earth

Future changes to this privacy notice

We may change this privacy notice occasionally in order to reflect changes in the law, as well as our privacy practices. While we encourage you to check this notice on our website regularly, we will notify you should any substantial change take place.

Data Protection Officer (DPO)

Our Data Protection Officer is Stephen Pack. You can get in touch with Mr. Pack using the contact details provided above.

What personal information about you do we process?

Personal information that we will process in connection with our products, services, and consulting and employment relationships includes:

- Personal contact details (e.g. title, full name, physical & email address)

- Google Analytics data (e.g. I.P. address, browser info, geography)
- Details about your financial status (e.g. assets, income, source of wealth)
- Details about bank accounts as needed for the transfer of funds
- Information required to satisfy requirements for politically exposed person checks in the KYC process
- Corporate structure, if you are the chief representative or major shareholder of a corporate entity with which we do business

Where does your personal information come from?

We will collect personal information from the following sources:

- From you directly, when filling out KYC documents or through our interactions
- From your web browser (I.P. address)

What do we use your personal data for?

We use your personal data for the following purposes:

- To improve the operation of our business and that of our business partners
- To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- To monitor and to keep records of our communications with you and our staff
- To administer our good governance requirements such as internal reporting and compliance obligations or administration required
- For market research and analysis and developing statistics
- To comply with legal and regulatory obligations, requirements and guidance including KYC requirements in the jurisdictions in which we do business

What are the legal grounds for our processing of your personal information, and when can we share it with others?

We rely on the following legal bases to use your personal data:

- Where it is in our legitimate interests to do so, such as:

- o To follow guidance and recommended best practice of government and regulatory bodies
- o To carry out monitoring and to keep records of our communications with you and our staff
- o For market research and analysis and developing statistics
- o Where we need to share your personal information with people or organisations to run our business or comply with any legal and/or regulatory obligations
 - To comply with our legal obligations
- o We are an authorised representative, and as such may be required to process data to comply with the FCA's rules. This may mean that we are unable to erase your data in certain circumstances, if to do so would result in a breach of the FCA's record keeping requirements.

When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed above:

- Business partners (e.g. other entities operated or affiliated with BwB)
- Government and regulatory entities
- Banks, legal counsel, auditors, and other vendors with whom we work to comply with legal and good governance regulations and guidance

How and when can you withdraw your consent?

Where we rely upon your consent to process your personal data, you can withdraw this at any time by contacting our Data Protection Officer (details above).

Is your personal information transferred outside the UK or the European Economic Area?

BwB is based in the UK, but sometimes your personal information may be transferred outside the European Economic Area. If we do so, we will make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

How do we share your information with Fraud Prevention Agencies?

We don't.

What should you do if your personal information changes?

You should tell us as soon as possible so that we can update our records. You can do so via the 'contact us' section of our website.

Do you have to provide your personal information to us?

You do not have to provide your personal information to us should you not wish to. However, we may be unable to provide you with our products or services, or communication, if you do not provide certain information to us. In cases where providing some personal information is optional, we will make this clear.

Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

How long do we retain your personal information?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- Retention periods in line with legal and regulatory requirements or guidance, in particular in conjunction with FCA rules.

What are your rights under data protection legislation?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>.

Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for certain reasons based on our legitimate interests. You can contact us by going to the Contact Us section of our website to exercise these rights.

How can you contact us?

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact our DPO, you can contact us via the methods listed above in the 'Data Protection Officer' section.

Complaints

All individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO) if they have concerns about how BwB has handled their information. Any

concerns can be reported via the ICO's website <https://ico.org.uk/concerns/> or over the telephone, by calling 0303 123 1113.