

INTRODUCTION

Welcome to Alt 21 (UK) Limited's privacy notice.

Alt 21 (UK) Limited respects your privacy and takes our Data Protection obligations very seriously and we are committed to protecting your personal data. This privacy notice informs you of how we look after your personal data when you visit our website and when you use our services and tells you about your privacy rights and how the law protects you. We are committed to complying with our legal obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) and other Data Protection laws as revised from time to time.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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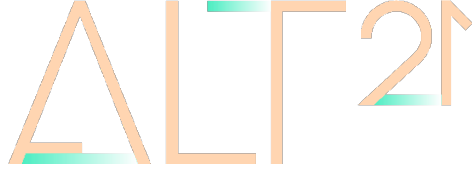
1. Important information and who we are

1.1 Purpose of this privacy notice

This privacy notice aims to give you information on how Alt 21 collects and processes personal data we collect from you or that you provide to us or that we obtain from third parties. This personal data may be obtained through the provision of our services to our clients in accordance with our terms and conditions, through our clients and potential client's use of the website (www.alt21.com) or through other direct communications between us and our clients or potential clients.

The website and our services are not intended for children, and we do not knowingly collect data relating to children. All people who register with us or who otherwise provide their personal data to us must be aged 18 or over.

It is important that you read this privacy notice together with our terms and conditions (a copy of which can be obtained upon request) and any other privacy notice we may provide on specific



occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1.2 Controller

ALT 21 Software Limited is incorporated in Ireland (No. 578153) with its registered office at Century House, Harold's Cross Road, Dublin 6W, Dublin, Ireland. It's subsidiary ALT 21 (UK) Limited is authorised and regulated by the Financial Conduct Authority (FRN: 783837) is a company registered in England and Wales (number 10723112). The registered address is 45 Eagle Street, London WC1R 4FS, United Kingdom.

ALT 21 (UK) Limited is the data controller and is responsible for your personal data (collectively referred to as "ALT21", "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Officer who is responsible for overseeing our compliance with all areas of Data Protection legislation. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer using the details set out below.

1.3 Contact details

Our full details are:

Full name of legal entity:	Alt 21 (UK) Limited
Name or title of data protection lead	Data Protection Officer
Email address:	dpo@alt21.com
Postal address:	45 Eagle Street, Holburn, London, England, WC1R 4FS
Telephone number:	+44 20 8068 7318

You have the right to make a complaint at any time to a relevant supervisory authority in respect of Data Protection matters. The Information Commissioner's Office (ICO) is the UK's supervisory authority for Data Protection issues (www.ico.org.uk), the Data Protection Commissioner is the Irish supervisory authority (www.dataprotection.ie) and the CNPD is the Portuguese supervisory authority (www.cnpd.pt). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us using the details set out in the table above in the first instance.

1.4 Changes to the privacy notice and your duty to inform us of changes

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, if you are a current client, notified to you by email. This version was last updated on 15/08/23. Prior versions can be obtained by contacting us.

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.

1.5 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

1.6 The data we collect about you

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identifying information has been removed (anonymous data).

We may process different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** means first name, last name or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** means residential address, email address and telephone numbers.
- **Financial Data** means bank account details or any relevant finance information.
- **Transaction Data** means details about payments to and from you and details of contracts you have entered into with us.
- **Usage Data** means information about how you use our website, products and services.
- **Marketing and Communications Data** means your preferences in receiving marketing from us and your communication preferences.

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. Should you decide to share this information with us we will consider you provide this to us with your consent.

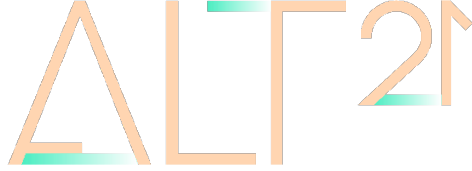
1.7 If you fail to provide personal data

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, execute a payment on your behalf). In this case, we may have to terminate the contract you have with us but we will notify you if this is the case at the time.

2. How is your personal data collected?

2.1 We use different methods to collect data from and about you including through:

- (a) **Direct interactions.** You may give us your Identity Data, Contact Data, Financial Data, Transaction Data and Marketing and Communications Data by filling in forms or by corresponding with us via our website or by post, phone, email, messaging services or otherwise. All contact is recorded for legal purposes to comply with the Financial



Conduct Authority requirements and for training and monitoring purposes.

- (b) **Automated technologies or interactions.** As you interact with our website, we may automatically collect Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Further information about our cookie use can be found in our cookie policy.
- (c) **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - (i) Identity Data, Contact Data, Financial Data and Transaction Data from our client who shares your personal data with us so that (a) you can use our services on their behalf; and (b) they can pay money to you (for example, for payment for goods and/or services if you are their supplier),
 - (ii) Usage Data from our website by analytics providers such as Google,
 - (iii) Identity Data, Contact Data and Financial Data from electronic identity verification providers or credit check providers (such as Creditcheck),
 - (iv) Identity Data and Contact Data from publicly available sources such as Companies House and Electoral Registers based inside the UK and the EU.

3. Use of personal data

3.1 How we use your personal data

We will only use your personal data when Data Protection legislation allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) where we need to perform the contract we are about to enter into or have entered into with you;
- (b) 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; and
- (c) where we need to comply with a legal or regulatory obligation.
- (d) where we have your consent.

Please see paragraph 3.2 (purposes for which we will use your personal data) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the details set out in paragraph 1.3.

3.2 Purposes for which we will use your personal data

We have set out below a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified where we are using our legitimate interests as a legal basis and what these are, where appropriate.

Please note that we may process your personal data for more than one lawful condition for processing depending on the specific purpose for which we are using your data. Please contact us using the details set out in paragraph 1.3 if you need details about the specific legal bases

we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you or your employer / company as a new client.	Identity Data Contact Data Financial Data	Article 6(1)(b) Performance of a contract with you or your employer / company.
To record contact with you or your employer / company by audio, video and in writing (all contact is recorded for legal and training and monitoring purposes).	Identity Data Contact Data Financial Data Transaction Data	Article 6(1)(c) Necessary to comply with a legal obligation. (Financial Conduct Authority)
To process and deliver the services including: (a) managing payments, fees and charges (b) collecting and recovering money owed to us	Identity Data Contact Data Financial Data Transaction Data	Article 6(1)(b) Performance of a contract with you Article 6(1)(f) Necessary for our Legitimate Interests (to recover debts due to us).
To enter into a contract relating to currency with you	Identity Data Contact Data Financial Data Transaction Data	Article 6(1)(b) Performance of a contract with you.
To execute payments on your behalf under contract (such as sending money to beneficiaries)	Identity Data Contact Data Financial Data Transaction Data	Article 6(1)(b) Performance of a contract with you. Article 6(1)(c) Necessary to comply with a legal obligation. (in particular Regulation (EU) 2015/847 on information accompanying transfers of funds (commonly referred to as the revised Wire Transfer Regulation)).
To manage our relationship with you which will include: (a) notifying you about changes to our terms and conditions or privacy policy (b) asking you to leave a review or take a survey	Identity Data Contact Data Usage Data Marketing and Communications Data	Article 6(1)(b) Performance of a contract with you. Article 6(1)(c) Necessary to comply with a legal obligation. Article 6(1)(f) Necessary for our Legitimate Interests (to review our services)

To enable you to partake in a prize draw, competition or complete a survey.	Identity Data Contact Data Usage Data Marketing and Communications Data	Article 6(1)(f) Necessary for our Legitimate Interests (to study how clients use our services, to develop them and grow our business)
To protect our business and this website (including for the purposes of fraud prevention, credit risk reduction, prevention of money - laundering)	Identity Data Contact Data Usage Data	Article 6(1)(c) Necessary to comply with a legal obligation.
To administer our business and this website (including for the purposes of troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Usage Data	Article 6(1)(f) Necessary for our Legitimate Interests (for running our business, provision of administration and IT services, network security and in the context of a business reorganisation or group restructuring exercise).
To receive support to run our business (including administrative support and compliance support) and corporate direction.	Identity Data Contact Data Financial Data Transaction Data	Article 6(1)(f) Necessary for our Legitimate Interests (to run our business with administrative and compliance support).
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Data Contact Data Usage Data Marketing and Communications Data	Article 6(1)(f) Necessary for our Legitimate Interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	Usage Data	Article 6(1)(f) Necessary for our Legitimate Interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you.	Identity Data Contact Data Usage Data Marketing & Communications Data	Article 6(1)(f) Necessary for our Legitimate Interests (to develop our products/services and grow our business)
To send you a seasonal card or gift.	Identity Data Contact Data Marketing & Communications Data	Article 6(1)(f) Necessary for our Legitimate Interests (to develop our products/services and grow our business)

Please note this is not an exhaustive list but gives you an indication of the purpose of our processing and our legal basis.

3.3 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can ask us to stop sending you marketing messages at any time.

3.4 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Alt 21 group of companies for marketing purposes.

3.5 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

3.6 Cookies

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.alt21.com/cookie-policy/>.

3.7 Change of purpose

We will only use your personal data for the purposes for which we collected or received it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out in paragraph 1.3.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Disclosures of your personal data

4.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3.2 (purposes for which we will use your personal data) above:

- (a) ALT 21 Software Limited, Ireland.
- (b) Other financial institutions and intermediaries which we send money to complete a payment to comply with the Regulation (EU) 2015/847 on information accompanying transfers of funds (revised wire transfer regulation), foreign exchange, banking and compliance providers, suppliers of technical support services, insurers, logistics providers and cloud services providers.
- (c) Professional advisers and other advisers including lawyers, bankers, compliance advisers, auditors, insurers and other persons based in the United Kingdom and the EU who provide consultancy, banking, financial checks, legal, insurance, accounting and marketing services; where necessary in specific circumstances.
- (d) The Financial Conduct Authority and HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- (e) Service providers who assist us in onboarding our customers by carrying out relevant regulatory financial checks on you, for example electronic identification searches, address checks, politically exposed person searches and sanctions checks on our behalf.
- (f) Service providers for services such as IT, web development, hosting and system administration, storage and archive of our data, survey providers etc.
- (g) Credit reference agencies and businesses which assist us in preventing fraud and complying with our obligations in relation to the prevention of money laundering and terrorist financing.
- (h) Credit control and debt collection agencies in the event that you do not pay us money that you owe us.
- (i) To enforce or apply our Terms of Service or other agreements or to protect Alt 21 and its customers (including with other companies and organisations for the purposes of fraud protection and credit risk reduction).
- (j) To any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- (k) third parties 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. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- (l) To any other person with your consent to the disclosure.

4.2 A list of third parties who we may share your data with can be obtained from our Data Protection Officer. Please note this list is not exhaustive but gives an indication of the data we share with third parties.

4.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. International transfers

5.1 Our data is typically hosted in the UK and other parts of the EEA, there are however some of our contracted technical service providers that process data from outside of the EEA. Where these transfers and any other transfers that may occur in the future are concerned, we ensure that there is a legal basis for the transfer and a lawful transfer mechanism in place prior to any transfers in place, in accordance with Data Protection legislation.

5.2 Any such transfers are currently done using either a transfer to a country with an adequacy ruling, or if a third country, using the UK International Data Transfer Agreement (IDTA), or the European Commission Standard Contractual Terms (SCC's) with the UK ICO Standard Contractual Clauses Addendum and the relevant transfer impact assessments. Should the international data transfer requirements change, we will review the obligations and amend this notice as appropriate. More information can be obtained by contacting our Data Protection Officer.

6. Data security

6.1 We take the security of your personal data very seriously. 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.

6.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and the relevant Supervisory Office and the Financial Conduct Authority of a breach where we are legally required to do so.

7. 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, 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 requirements.

By law we have to keep basic information (including Identity Data, Contact Data, Financial Data and Transaction Data) about our clients, their directors, partners and ultimate beneficial owners and beneficiaries for five years after they cease being clients for the purpose of compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

In some circumstances you can ask us to delete your data: see paragraph 8 below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

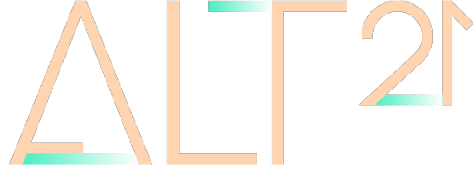
8. Your legal rights

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- 8.1 **Right to be informed** by the provision of a privacy notice when your personal information is processed.
- 8.2 **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 8.3 **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 8.4 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- 8.5 **Right to object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 8.6 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you.
- 8.7 **Request the transfer** of your personal information to another party.
- 8.8 **Automated decision making, including profiling** We do not envisage we will utilise any automated decision-making technology, however, should this change, we will inform you.
- 8.9 If you would like to exercise any of your legal rights in relation to the personal data we hold about you, you can contact us by email at dpo@alt21.com, in writing to the address or by telephone, listed at section 1.3.
- 8.10 Generally you will not have to pay a fee to exercise any of your legal rights. However, we are entitled to charge a reasonable fee if any request is clearly unfounded, repetitive or excessive. We can also refuse to comply with an unfounded or excessive request. We may need to request information from you to confirm your identity, in order to make sure that personal data is not disclosed to someone who is not entitled to have it. We may also need to ask you for additional information to help us respond to your request.
- 8.11 We will try to respond to your request within one month but, if the request is very complex or if you have made a number of requests, we are legally able to extend the request by an



additional two months. In such circumstances, we will explain to you why it will take longer to respond, and we will keep you updated.

8.12 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

8.13 Changes to this Privacy Notice

From time to time, we may revise this Privacy Notice. Any such changes will be reflected on this page. Alt 21 recommends that you review this Privacy Notice regularly for any updates. The date on which this notice was last revised is located below.

Revision History			
No	Details	Date	Author
V1.1	Review	02/06/23	DPO
V1.2	Rebrand to Alt 21	15/08/23	DPO
V1.3	Change of address	14/05/24	DPO