

# Privacy Policy

## 1. Introduction

FintechXpress Group Ltd ("we", "us", "our") is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, store, and protect your personal information when you use our website and services.

Data Controller:

- Company Name: FintechXpress Group Ltd
- Registered Address: 85 Great Portland Street, First Floor, London, United Kingdom
- Contact Email: [invest@fintechxpress.com](mailto:invest@fintechxpress.com)
- Data Protection Officer: SBS DATA PROTECT GmbH – Thilo Noack / [noack@sbs-data.de](mailto:noack@sbs-data.de)

This Privacy Policy complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 2. Information We Collect

### 2.1 Personal Information You Provide

- Identity Data: Name, title, date of birth, nationality
- Contact Data: Email address, telephone number, postal address
- Professional Data: Company name, position, business address
- Technical Data: IP address, browser type, device information
- Usage Data: How you interact with our website

### 2.2 Information We Collect Automatically

- Cookies and Tracking: We use cookies and similar technologies
- Security Monitoring: Access logs, security incident data

## 2.3 Information from Third Parties

- Due Diligence Providers: Compliance screening
- Professional References: As part of investor qualification
- Public Sources: Company registrations, regulatory filings

## 3. Legal Basis for Processing

We process your personal data based on:

### 3.1 Legitimate Interests

- Providing information about funding opportunities
- Website security and fraud prevention
- Marketing communications (where you haven't opted out)
- Business development and relationship management

### 3.2 Contract Performance

- Processing ticket reservations
- Providing requested services
- Managing investor relationships

### 3.3 Legal Compliance

- Anti-money laundering checks
- Know Your Customer (KYC) requirements
- Regulatory reporting obligations
- Tax compliance

### 3.4 Consent

- Marketing communications (where required)
- Optional data collection
- Cookies (where required)

## **4. How We Use Your Information**

### 4.1 Primary Purposes

- Service Provision: Processing reservations and providing funding information
- Communication: Responding to inquiries and providing updates
- Compliance: Meeting legal and regulatory obligations
- Security: Protecting against fraud and unauthorized access

### 4.2 Secondary Purposes

- Analytics: Improving website performance and user experience
- Marketing: Sending relevant funding opportunities (with consent)
- Business Development: Understanding market trends and opportunities

## **5. Information Sharing and Disclosure**

### 5.1 Third Parties We May Share With

- Legal and Compliance: Solicitors, compliance consultants, regulatory bodies
- Service Providers: IT support, payment processors, cloud storage providers
- Professional Advisors: Accountants, auditors, business consultants
- Due Diligence: Background check providers, credit reference agencies

### 5.2 International Transfers

When we transfer data outside the UK, we ensure:

- Adequacy decisions exist, or
- Appropriate safeguards are in place (Standard Contractual Clauses)
- Explicit consent where required

## 5.3 Legal Requirements

We may disclose information when required by:

- Court orders or legal proceedings
- Regulatory investigations
- Law enforcement requests
- Tax authorities

## 6. Data Retention

### 6.1 Retention Periods

- Active Investors: Duration of relationship plus 7 years
- Unsuccessful Applications: 12 months after decline
- Marketing Data: Until consent withdrawn plus 2 years
- Website Analytics: 24 months
- Security Logs: 12 months

### 6.2 Legal Requirements

Some data must be retained longer for:

- Anti-money laundering compliance (5 years)
- Tax records (6 years)
- Company law requirements (varies)

## 7. Your Rights Under UK GDPR

### 7.1 Access and Portability

- Right of Access: Request copies of your personal data
- Data Portability: Receive data in structured, machine-readable format

### 7.2 Correction and Deletion

- Right to Rectification: Correct inaccurate personal data

- Right to Erasure: Request deletion (subject to legal obligations)

### 7.3 Processing Restrictions

- Right to Restrict: Limit how we process your data
- Right to Object: Object to processing based on legitimate interests
- Right to Withdraw Consent: Where processing is based on consent

### 7.4 Automated Decision Making

You have rights regarding automated decision-making and profiling, including the right to human review.

## 8. Cookies and Tracking

### 8.1 Types of Cookies

- Essential: Necessary for website functionality
- Analytics: Understanding website usage (Google Analytics)
- Marketing: Delivering relevant advertisements
- Preferences: Remembering your settings

### 8.2 Cookie Management

You can control cookies through:

- Browser settings
- Our cookie preference center
- Third-party opt-out tools

## 9. Data Security

### 9.1 Technical Measures

- Encryption: Data encrypted in transit and at rest
- Access Controls: Role-based access restrictions
- Monitoring: Continuous security monitoring

- Updates: Regular security patches and updates

## 9.2 Organizational Measures

- Staff Training: Regular data protection training
- Policies: Comprehensive data protection policies
- Incident Response: Procedures for data breaches
- Vendor Management: Due diligence on service providers

## 10. Data Breach Notification

In case of a data breach, we will:

- Report to the ICO within 72 hours (where required)
- Notify affected individuals without undue delay (where required)
- Take immediate steps to mitigate harm
- Investigate and document the incident

## 11. Contact and Complaints

### 11.1 Contact Us

For privacy questions or to exercise your rights:

- Email: [dpo@fintechpxress.com](mailto:dpo@fintechpxress.com)

### 11.2 Response Times

We will respond to requests within one month (extendable to three months for complex requests).

### 11.3 Complaints

You have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: [ico.org.uk](http://ico.org.uk)

- Phone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

## 12. Changes to This Policy

We may update this Privacy Policy periodically. We will notify you of significant changes by:

- Posting updates on our website
- Email notification (for material changes)
- Prominent website notices

## 13. International Users

If you are accessing our website from outside the UK, please note that your data may be transferred to and processed in the UK, which has adequate data protection laws.

This Privacy Policy was last updated on 03.06.2025 and is effective immediately.