

BACKGROUND:

Co-Funding understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.co-funding.co.uk (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your continued use of Our Site confirms your acceptance of this Privacy Policy.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features (i.e. the platform) on Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended into equivalent UK domestic law);
Third Party Licensees	means those corporate third party Account holders who have been provided with a licence to use and operate their own dashboard under the platform to manage their investment projects.

2. Information About Us

Our Site is owned by us, Co-Funding LTD, a limited company registered in England under company number 12557318.

Data Protection Officer e-mail address: dpo@co-funding.co.uk

The platform on Our Site is operated by us for functional support, maintenance and system update purposes only.

The platform on Our Site is operated by Third Party Licensees who have licenced use and access to their own dashboard within the platform. Please refer to our Terms of Use for more information.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site in so far as accessing your Account is concerned.

Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the

privacy policies of any such websites before providing any data to them.

This Privacy Policy does not apply to the processing of your personal data by Third Party Licensees who manage their investment projects through the platform. Please note that we have no control over how your data is collected, stored, or used by the Third Party Licensees and we advise you to check the privacy policies of any such Third Party Licensees before providing any data to them through the platform.

4. **What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as

outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

6. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies.

Data Collected	How We Collect the Data
<u>Identity Information</u> including: <ul style="list-style-type: none"> ● Name ● Title ● Date of birth ● Nationality ● Passport contents ● Driving Licence contents 	Provided by you when you submit the details on Our Site to create your Account
<u>Contact information</u> including: <ul style="list-style-type: none"> ● Address ● Email address ● Telephone number 	Provided by you when you submit the details on Our Site to create your Account
<u>Profile information</u> including: <ul style="list-style-type: none"> ● Login details 	Provided by you when you submit the details on Our Site to create your Account
<u>Payment information</u> including: <ul style="list-style-type: none"> ● Bank account details (sort code and account number) 	Provided by you when you submit the details on Our Site to create your Account
<u>Technical information</u> including: <ul style="list-style-type: none"> ● IP address ● IP location ● Browser type ● Operating system 	Provided by your computer when you use Our Site
<u>Data from third parties</u> including: <ul style="list-style-type: none"> ● KYC / AML report which may contain justification for any failed checks (e.g. politically exposed persons) 	Provided electronically by third parties including Third Party Licensees, MangoPay SA and Sum and Substance Ltd (UK)

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal

data. The following table describes how we may use your personal data, and our lawful basis for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site.	<ul style="list-style-type: none"> ● Identity information ● Contact information ● Profile information ● Payment information ● Technical information ● Data from third parties 	<ul style="list-style-type: none"> ● To perform a contract with you, or ● Where we have legitimate interests to process the personal data and they're not overridden by your rights, or ● In accordance with a legal obligation, or ● Where we have your consent.
Providing and managing your Account.		
Providing and managing your access to Our Site.		
Administering Our Site.		
Communicating with you.		
Creating your e-money account with a third party provider means we will share the required personal data with that provider.	<ul style="list-style-type: none"> ● Identity information ● Contact information ● Payment information 	<ul style="list-style-type: none"> ● To perform a contract with you, or ● Where we have your consent.
Conducting your KYC/AML check with a third party provider means we will share the required personal data with that provider.	<ul style="list-style-type: none"> ● Identity information ● Contact information ● Payment information 	<ul style="list-style-type: none"> ● To perform a contract with you, or ● Where we have legitimate interests to process the personal data and they're not overridden by your rights, or ● In accordance with a legal obligation, or ● Where we have your consent.

You will not be sent any unlawful marketing or spam by us. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended into equivalent UK domestic law), and you will always have the opportunity to opt-out.

Third Parties (including Third Party Licensees, MangoPay SA and Sum and Substance Ltd (UK)) whose content appears on Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal

data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity information	The period of time we keep your personal data depends on whether we have an ongoing requirement or need to retain it (for example, to enable you to use your Account or to comply with applicable legal requirements).
Contact information	
Profile information	
Payment information	We will retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing requirement or need to retain it (for example, to comply with applicable legal requirements)
Technical information	Following that period, we'll make sure it's deleted or anonymised.
Data from third parties	Data from third parties will only be retained by us in accordance with the instructions provided by the third parties or by you, subject to compliance with any applicable legal requirements.

9. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so; and
- ensuring our security systems are regularly updated to combat against malware and other unwanted defects.

10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We utilise the services of third parties in order to provide AML/KYC checks and payment processes.

Recipient	Activity Carried Out	Location
MangoPay SA	Provides payment processes within the platform.	Luxembourg (EU)
Sum and Substance Ltd (UK)	Provides AML/KYC checking processes within the platform.	UK

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 9.

However, please note, you will be bound by the terms of the third parties’ privacy policy where you are providing your personal data directly to the third party through our platform.

11. How Can I Control My Personal Data?

In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, at times, you may be given options to restrict our use of your personal data.

12. Can I Withhold Information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site including the platform and to create an Account you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. **How Do You Use Cookies?**

Currently the only first-party Cookies placed on your computer or device by us is if you request that your login details are remembered by your computer or device. Where in the future we use any additional first-party Cookies, our privacy policy will be updated to inform you. Where we use additional Cookies in the future, this will be to facilitate and improve your experience of Our Site and to provide and improve the platform. We will ensure we always carefully choose Cookies and will take steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies may be used on Our Site by MangoPay SA or Sum and Substance Ltd (UK). For more details, please refer to their privacy policies.

All Cookies used by and on Our Site, are and will be, used in accordance with current Cookie Law.

Before any new first-party Cookies are placed on your computer or device, you will be shown a prompt requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the Data Protection Officer):

Email address: dpo@co-funding.co.uk

16. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.