

PRIVACY NOTICE

Last updated May 4, 2023

Version 4

This privacy notice for Bondsmith Savings Ltd (doing business as Bondsmith or The Deposit Service) ('**Bondsmith**', '**The Deposit Service**', '**we**', '**us**', or '**our**'), describes how and why we might collect, store, use, and/or share ('**process**') your information when you use our services ('**Services**'), such as when you:

- Visit our website at <https://www.thedepositservice.co.uk>, or any website of ours or our distribution partners, that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at dpo@bondsmith.co.uk.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with The Deposit Service and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We may process sensitive personal information, when necessary, with your consent as permitted by applicable law, or otherwise with your consent (if applicable).

Do we receive any information from third parties? We may receive information from public databases, marketing partners, any provider of products which are connected to any Services, any advisor or party who is acting on your behalf, social media platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law and our legal obligations. We may also process your information for other purposes with your consent. We process your information only when we have a valid lawful reason to do so.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties.

How do we keep your information safe? We have technical and organisational processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will

not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us directly or indirectly.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your direct or indirect interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include (but not necessarily limited to) the following:

- Names

- Phone Numbers
- Email Addresses
- Billing Addresses
- Sort Code and Account Numbers
- Contact Preferences
- Contact or Authentication Data
- Job Titles
- Mailing Addresses
- Usernames
- Passwords
- National Insurance Number
- Source of Funds
- Employment Status and Income
- Due Diligence Data
- Third party products or our products that you have shown or have an interest in

Sensitive Information. When necessary, where we have a lawful right to do so, or otherwise when we require your consent (as applicable), we process the following categories of sensitive information:

- Financial Data
- Information Revealing Race or Ethnic Origin
- Information revealing political opinions
- Social security numbers or other government or tax identifiers
- All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information in a timely manner. You must also immediately advise us in writing if any appointed financial advisor of yours is no longer appointed by you to have access to your personal information.

Information automatically collected

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected from other sources

***In Short:** We may collect limited data from public databases, marketing partners, your advisors who you have appointed on your behalf, our affiliated companies and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers, and products and our Services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, product providers that you have taken up from our Services, your professional advisors, our affiliated companies and from other third parties. This information includes monies you may want to save or invest, mailing addresses, job titles, email addresses, phone numbers, residential addresses and other contact details, intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion and the administration of the Services and any related product.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process your information to provide, improve, and administer our Services, communicate with you and/or your appointed advisors, including for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you (and/or any of your appointed advisors) can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** We may process your information to directly and/or indirectly provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send or make available to you and/or your appointed advisors, details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfil and manage your orders, requests or instructions.** We may process your information to fulfil and manage your orders, requests, instructions, payments, withdrawals, and other applicable matters, made through the Services.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- **To Provide your information to your appointed financial advisors.** We may process your information for your appointed financial advisors where you have instructed them to act on your behalf. You must immediately advise us in writing if any appointed financial advisor of yours is no longer appointed by you to have access to your personal information.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. lawful basis) to do so under applicable law, to (for example) to provide you with products and Services, to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests or comply with applicable law. Where there is no existing lawful basis, then we will only do so with your consent, in accordance with applicable laws,

The UK GDPR requires us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following lawful bases to process your personal information:

- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Analyse how our services are used so we can improve them to engage and retain users
 - Diagnose problems and/or prevent fraudulent activities
 - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement or crime prevention or investigative related body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved or ordered by a court of competent jurisdiction to do so.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.
- **Consent. Other than the grounds stated above,** we may otherwise process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following categories of third parties.

Vendors, Consultants, advisors and Other Third-Party Service Providers. We may share your data with your appointed professional financial advisors. Also we may share your data with third-party vendors, service providers, contractors, or agents ('**third parties**') who perform services for us or on our behalf or otherwise provide savings or investment related accounts which you wish to or will use and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. They will, depending on their role, only use your personal information either under terms we have agreed

with them, or otherwise in compliance with applicable law. The categories of third parties we may share personal information with are as follows:

- Authentication and Verification Tools
- Cloud Computing Services
- Data Storage Service Providers
- Payment Processors
- User Account Registration & Authentication Services
- Providers of savings accounts or other investments

We also may need to share your personal information in the following situations:

- With any affiliate company of ours who provides any trust service
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than sixty (60) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of technical and organisational security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data which we may have collected from children under age 18, please contact us at dpo@bondsmith.co.uk.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In the United Kingdom (UK), you have rights that allow you greater access to and control over your personal information.

You have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in section 12 below.

We will consider and act upon any request in accordance with applicable data protection laws and the basis upon which we are holding or processing your personal data.

If you believe that we are unlawfully processing your personal information or you have concerns about the way in which we are processing your personal information, you have the right to complain to the regulator. Our regulator is the Information Commissioner's Office (ICO), who can be contacted at ico.org.uk/global/contact-us.

Withdrawing your consent: If we are relying only upon your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in section 12 below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the continued processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt out of interest-based advertising by advertisers on our Services visit <http://www.aboutads.info/choices/>.

If you have questions or comments about your privacy rights, you may email us at dpo@bondsmith.co.uk.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

11. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws or otherwise.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification or otherwise by making it

available to you. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), by email at dpo@bondsmith.co.uk, or by post to:

FAO The DPO
Bondsmith Savings Ltd
124-128 City Road
London EC1V 2NJ
United Kingdom

13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please contact us using the contact details provided in section 12 above.