

Privacy Notice

Welcome to FINT

We are **FINT** - a cutting edge digital solution providing access to financial products and services powered by Ironmarket Limited.

Ironmarket Limited (a private limited company registered with company number 08411874 and with registered address located at Unit 10, Brindley Court, Dalewood Road, Lymedale Business Park, Newcastle-Under-Lyme, ST5 9QA) (**Ironmarket, we, us, our**) is the provider of financial products and services made available to you via FINT.

We are committed to protecting the privacy and security of the personal data of all those who access and use our products and services. This Privacy Notice describes how your personal data is collected, used and looked after when you access and use the FINT App, visit the website fintinvest.com (our **Site**) (regardless of where you visit it from), or otherwise use the financial products and services made available to you from time to time (together our **Products and Services**). This Privacy Notice also tells you about your rights and how the law protects you.

1 Important information

- 1.1 This Privacy Notice supplements the other notices and terms published on our Site (including our Website Terms of Use, and our App Terms and Conditions of Service (**Terms**)) and is not intended to override them.
- 1.2 Ironmarket are the controller of, and are responsible for, your personal data when we access and use your personal data in accordance with this Privacy Notice.
- 1.3 For further assistance in understanding this Privacy Notice, we have set out in the Schedule a glossary of terms used in this Privacy Notice, examples of the types of personal data we collect, how we use it, the lawful basis for processing such personal data and further details of your rights.
- 1.4 If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact our data protection officer (**DPO**) in writing, either by:

Email: help@fintinvest.com

Post: Unit 10 Brindley Court Dalewood Road
Lymedale Business Park
Newcastle-Under-Lyme
England
ST5 9QA

- 1.5 You have the right to make a complaint at any time to the ICO (www.ico.org.uk), the UK regulator for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so we would be grateful if you would please contact us in the first instance.
- 1.6 Our Site and Products and Services are not intended for children, and we do not knowingly collect data relating to children.
- 1.7 We may change this Privacy Notice from time to time by updating this page. Please check it regularly to ensure that you are aware of any changes.
- 1.8 It is important that the data we hold about you is accurate and current, therefore please keep us informed of any changes to your personal data.
- 1.9 Our Site and Products and Services may include links to third-party websites, plug-ins and applications. By clicking on these links or enabling connections you may be allowing third parties to collect or share your personal data. We have no control over these third-party websites, plug-ins or applications and are not responsible for their privacy notices, therefore you should read their privacy notices to understand what personal data they collect about you and how they use it.

2 The data we collect about you

- 2.1 We may collect, use, store and transfer the types of personal data about you listed in Part 1 of the Schedule.
- 2.2 We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. However, if we combine aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as your personal data which will be used in accordance with this

Privacy Notice.

2.3 We collect special categories of personal data.

In order to protect the security of our Products and Services, in certain instances we use biometric scanning and other similar technologies, and in doing so, collect special category (sensitive) personal data. The exemption we rely upon to process such special categories of personal data are set out in Part 2 of the Schedule.

2.4 If we are required by law, or under the terms of a contract we have with you, to collect your personal data and you fail to provide it:

2.4.1 we may not be able to enter into or perform the contract with you; and/or

2.4.2 we may have to cancel our Products and Services and/or the contract (as applicable).

We will notify you of this at the relevant time.

3 How personal data is collected

We collect personal data in the following ways:

Direct interactions	You may provide personal data when you access and use our Products and Services and/or our Site, or otherwise correspond with us (by post, phone, or email).
Automated technology	We automatically collect personal data (technical and usage) when you browse or interact with our Site, by using server logs and other similar technologies. We may also receive technical data about you if you visit other websites.
Publicly available sources	We may collect personal data from publicly available sources such as the Electoral Register and credit reference agencies, based in the UK.
Third parties	We may receive personal data from: (a) analytics providers; (b) advertising networks; (c) search information providers; and (d) our suppliers such

	as Site support and maintenance providers, or platform provider(s).
--	---

4 How we use your personal data

4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data:

4.1.1 to perform the contract we are to enter into, or have entered into with you, for the supply of our Products and Services;

4.1.2 to comply with a legal obligation; or

4.1.3 where it is necessary to carry out our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

4.2 Part 2 of the Schedule sets out the lawful basis we will rely on to process your personal data.

4.3 Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your information.

4.4 We will only use your personal data for the purpose that we originally collected it for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or we have a lawful basis to change the purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

4.5 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 use your personal data in this manner.

4.6 We may process your personal data (without your knowledge or consent) where this is required or permitted by law.

4.7 Marketing

4.7.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

- 4.7.2 You will only receive marketing communications from us, if you have:
- (a) previously used our Products and Services; or
 - (b) you have provided your consent to receive marketing communications;

and have not opted out of receiving marketing communications, unsubscribed from our mailing list or withdrawn your consent.

4.7.3 We will not share your personal data with third parties for their marketing purposes.

4.7.4 You can opt out of email marketing by clicking the unsubscribe button within the particular marketing email. You can also withdraw your consent to receive marketing communications and ask to be removed from our mailing list at any time by contacting us.

4.7.5 Even if you opt out of receiving marketing communications, we may still use your personal data for other purposes provided we have a lawful basis to do so.

4.8 **Automated decision making and profiling**

4.8.1 Our Products and Services offer varying levels of financial risk exposure. We are committed to acting in a prudent manner and therefore seek to ensure that our customers access those of our Products and Services which are appropriate for their requirements.

4.8.2 To ensure that we provide access to our Products and Services which are suitable for you (taking into account your appetite for financial risk), we need to understand your financial and investment history.

4.8.3 When you create an account with FINT and complete the on-boarding process, we use certain tools and third party products to obtain the relevant information from you to subsequently produce a profile of your capacity for financial and investment risk (your **Risk Profile**).

4.8.4 The tools and third party products we use to generate your

Risk Profile process your personal data in order to generate your Risk Profile. Further information of the Third Parties we use for this purpose are set out in Part 4 of the Schedule.

4.8.5 Automated decision making.

- (a) When we receive your Risk Profile, we make an automated decision as to which of our Products and Services are most suitable for you dependent upon your appetite for financial risk, and which Products and Services we therefore make available to you.
- (b) We make this automated decision by use of our own software. Our software identifies the level of appetite for financial risk set out within your Risk Profile (which may be low, medium, or high) and matches you to those of our Products and Services which offer a corresponding level of financial risk exposure – either low, medium or high degree (as appropriate).
- (c) When we process your personal data to make an automated decision, we rely upon the legal basis that to do so is necessary to perform the contract we are to enter into, or have entered into with you, for the supply of our Products and Services.

5 Disclosure of your personal data

We may share your personal data with the Third Parties set out in Part 4 of the Schedule. We require all Third Parties to respect the security of your personal data and to treat it in accordance with the law. Such Third Parties can only process your personal data for specified purposes and in accordance with our instructions.

6 International transfers

- 6.1 Some Third Parties may be based outside of the UK, therefore your personal data may be transferred outside of the UK.
- 6.2 Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - 6.2.1 we will only transfer personal data to countries that have

been deemed to provide an adequate level of protection for personal data; and

6.2.2 we use specific contracts approved for use in the UK which give personal data the same protection it has in the UK with our services providers.

6.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7 Data security

7.1 We operate appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to personal data is restricted to individuals who have a business need to know it, are under confidentiality obligations and can only process it on our instructions.

7.2 We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 Data retention

8.1 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, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

8.2 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, regulatory, tax, accounting, or other requirements.

8.3 We may update our data retention practices from to time and you can request details by contacting us. However, we are legally

required to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after the end of the tax year in which they cease being customers, for tax purposes.

- 8.4 We may also anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. We can use anonymised information indefinitely without further notice to you.

9 Your legal rights

- 9.1 Your legal rights in relation to your personal data are set out in full in Part 3 of the Schedule. If you wish to exercise any of your rights, please contact our us.
- 9.2 You will not have to pay a fee to exercise any of your rights unless your request is clearly unfounded, repetitive or excessive. In which case, we may charge a reasonable fee for this information or refuse to comply with your request.
- 9.3 We may ask you to provide further information to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who does not have the right to receive it.
- 9.4 We aim to respond to all legitimate requests within one month. If your request is particularly complex or you have made a number of requests it may take us longer to respond. In this case, we will notify you and keep you updated.

This Privacy Notice was created in January 2024.

Schedule

Part 1 Types of personal data

Contact data	Billing address, email address and telephone number.
Financial data	Account number and sort code, tax residency, details of income, salary, debts and financial commitments, assets, investments, real

	property and savings.
Identity data	First name, maiden name, last name, title, passport number, date of birth, National Insurance number, profession or occupation, nationality and location of residency, gender.
Special Category Personal Data	Biometric data including fingerprint and facial scan.
Marketing and communication data	Your preferences in receiving marketing from us, and your communication preferences.
Profile data	Password, customer interests and preferences, feedback and survey responses.
Technical data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Site.
Transaction data	Details about payments to and from you, your investment history, and other details of products and services customers have purchased.

Part 2 Lawful basis for processing and processing activities

The lawful basis upon which we may rely on to process your personal data are:

Consent	You have given your express consent for us to process your personal data for a specific purpose.
Contract	The processing is necessary for us to perform our contractual obligations with you under our contract, or because you have asked us to take specific steps before entering into a contract with you.
Legal	The processing is necessary for us to comply with legal or

obligation	regulatory obligation.
Legitimate interests	The processing is necessary for our or a third party's legitimate interest e.g., in order for us to provide the best service to you via our Site. Before we process your personal data on this basis we make sure we consider and balance any potential impact on you, and we will not use your personal data on this basis where such impact outweighs our interest.

The exemption we rely upon to process special categories of personal data are:

Explicit Consent	<p>You have given your explicit consent to the processing of your special category personal data.</p> <p>We rely upon this exemption (available under Article 9(2)(a) of the UK GDPR).</p>
-------------------------	--

Set out below are specific details of the processing activities we undertake with your personal data and the lawful basis for doing this.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer of our Products and Services, conduct ID and identity verification checks.	Identity, contact & special category	(i) to perform our contract with you; (ii) consent.
To supply our Products and Services we make available from time to time.	Identity, contact, financial, and transaction	To perform our contract with you.
To make an automated decision as to which of our Products and Services to make available to you in	Identity, financial and transaction	To perform our contract with you.

relation to your Risk Profile.		
To manage payments, fees and charges and debt recovery.	Identity, contact, financial, transaction, marketing & communications	(i) to perform our contract with you; (ii) as necessary for our legitimate interest in recovering debts due to us.
To manage our relationship with you and notify you of changes to our Terms or this Privacy Notice.	Identity, contact, profile, marketing & communications	(i) to perform our contract with you; (ii) as necessary to comply with a legal obligation; (iii) as necessary for our legitimate interests in keeping our records updated and analysing how customers use our Products and Services.
To administer and protect our business and our Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity, contact & technical	(i) as necessary for our legitimate interests in running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise; (ii) as necessary to comply with any legal obligations.
To deliver relevant Site content and/or advertisements to you and measure or understand the effectiveness of our advertising.	Identity, contact, profile, usage, marketing & communications, & technical	As necessary for our legitimate interests in studying how customers use our Site and Products and Services, to develop them, to grow our business and to inform our marketing strategy.
To use data analytics to improve our Site,	Technical & usage	As necessary for our legitimate interests to

<p>Products and Services, marketing, customer relationships and experiences.</p>		<p>define types of customers for our Products and Services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy.</p>
--	--	--

Part 3 Your legal rights

You have the following legal rights in relation to your personal data:

<p>Access your data</p>	<p>You can ask for access to and a copy of your personal data and can check we are lawfully processing it.</p>
<p>Correction</p>	<p>You can ask us to correct any incomplete or inaccurate personal data we hold about you.</p>
<p>Erasure</p>	<p>You can ask us to delete or remove your personal data where:</p> <ul style="list-style-type: none"> (a) there is no good reason for us continuing to process it; (b) you have successfully exercised your right to object (see below); (c) we may have processed your information unlawfully; or (d) we are required to erase your personal data to comply with local law. <p>We may not always be able to comply with your request for specific legal reasons, which will be notified to you at the time of your request.</p>
<p>Object</p>	<p>You can object to the processing of your personal data where:</p> <ul style="list-style-type: none"> (a) we are relying on our legitimate interest (or those of a third party) as the basis for processing your personal data, if you feel it impacts on your fundamental rights and freedoms;

	<p>(b) we are processing your personal data for direct marketing purposes.</p> <p>In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms and in such circumstances we can continue to process your personal data for such purposes.</p>
Restrict processing	<p>You can ask us to suspend or restrict the processing of your personal data, if:</p> <p>(a) you want us to establish the accuracy of your personal data;</p> <p>(b) our use of your personal data is unlawful, but you do not want us to erase it;</p> <p>(c) you need us to hold your personal data (where we no longer require it) as you need it to establish, exercise or defend legal claims; or</p> <p>(d) you have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.</p>
Request a transfer	<p>You can request a transfer of your personal data which is held in an automated manner and which you provided your consent for us to process such personal data or which we need to process to perform our contract with you, to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format.</p>
Withdraw your consent	<p>You can withdraw your consent at any time (where we are relying on consent to process your personal data). This does not affect the lawfulness of any processing carried out before you withdraw your consent.</p>

Part 4 Third Parties

Service providers for tech and IT infrastructure	<p>Acting as processors who provide IT and system administration services, including:</p> <ul style="list-style-type: none"> ● Solace Digital Ltd (company number 12855957)
---	--

<p>purposes</p>	<p>who provide hosting services for the supply of Products and Services. Further information as to how Solace Digital Ltd process your personal data can be found via Solace Digital Ltd's Privacy Policy.</p>
<p>Service providers for market data supply and/or risk analysis purposes</p>	<p>Acting as processors who provide financial and market trading data, and/or risk analysis solutions, including:</p> <ul style="list-style-type: none"> ● Oxford Risk Limited (company number 04571309) who provide risk profiling and assessment solutions for the purposes of our Products and Services. Further information as to how Oxford Risk Limited process your personal data can be found via Oxford Risk's Privacy Notice.
<p>Payment Gateway Providers</p>	<p>Acting as controller who require information to collect and process payments on our behalf in relation to the financial products and services we provide as part of our Products and Services, including:</p> <ul style="list-style-type: none"> ● WealthKernel Limited (company number 09686970). Further information as to how WealthKernel process your personal data can be found via WealthKernel's Privacy Policy.
<p>Professional advisors</p>	<p>Acting as processors or controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.</p>
<p>HM Revenue & Customs, regulators and other authorities</p>	<p>Acting as processors or controllers who require reporting of processing activities in certain circumstances.</p>
<p>Other third parties</p>	<p>Such third parties 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</p>

Part 5 Glossary

Aggregated data	Information such as statistical or demographic data which may be derived from personal data but which cannot by itself identify a data subject.
Controller	A body that determines the purposes and means of processing personal data.
Data subject	An individual living person identified by personal data (which will generally be you).
Personal data	Information identifying a data subject from that data alone or with other data we may hold but it does not include anonymised or aggregated data.
Processor	A body that is responsible for processing personal data on behalf of a controller.
Special categories of personal data	Information about race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, health, genetic, biometric data, sex life and sexual orientation.
ICO	Information Commissioner's Office, the UK supervisory authority for data protection issues.