

Fundment

Privacy Policy



Introduction

Fundment is committed to protecting and respecting your data privacy. This policy (together with any other documents referred to in it) sets out the basis on which any personal data we collect about you will be processed by us.

We will collect, store and use personal data in accordance with all applicable laws relating to the protection of personal data, including the retained UK version of the European General Data Protection Regulation ("GDPR"), as supplemented by the Data Protection Act 2018 and where relevant the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426) ("Data Protection Law").

Data Controller and Data Protection Officer

The controller of your personal data will be Fundment Limited, trading as Fundment ("Fundment"), which is incorporated and registered under company registration number 08884918 and which has its registered office at 58-60 Berners Street, London, W1T 3NQ.

We have appointed a data protection officer (a "DPO") who is responsible for overseeing questions relating to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (see 'Your Rights' below), please contact us and our DPO at any time at support@fundment.com.

Legal basis for processing personal data

Data protection law requires us to only process personal data where we have a lawful basis to do so.

We will only collect and process your personal data for one or more of the legally permitted reasons below:

- To perform a contract with you, including the provision of our services.
- To satisfy our legal and regulatory obligations.
- For our legitimate interests, including internal compliance and risk management, direct marketing of our products and services to you, enforcing legal claims, IT and network security performance, maintenance and improvement, market research, record keeping, compliance with our internal policies and procedures and other administrative purposes. We make sure that we consider and balance any potential impact of our processing on you and your rights (both positive and negative) before we process your personal data for our legitimate interests and we do not use your personal data for activities where our interests are overridden by the impact of the processing on you (unless we have your consent or are otherwise required or permitted to

undertake the processing by law).

- If we have received your consent.

Direct marketing

Please note that by using our platform you consent to receiving direct marketing communications from us. If you no longer wish to receive our marketing communications, there is an unsubscribe link located in the footer of all marketing emails that we send to you. If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer services purposes.

Personal data we collect about you

We may collect the following personal data about you:

- Identity Data: including your name(s) (current and previous), username(s), title, gender, age, date of birth and marital status;
- Contact Data: including address, telephone number, email address and personal identification numbers (e.g. passport number and/or national insurance number);
- Financial Information: including information concerning your savings and investments; income, bank details and credit/debit card numbers;
- Transaction Data: including details of payments to/from your accounts with us and services you have purchased from us;
- Technical information: including your internet protocol (IP) address, your login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system, device ID and other technology on the devices you use to access our platform and/or our marketing website (each a “Website” and together “Websites”);
- Profile Data: including your login information and password, purchases or orders made by you, your interests, preferences, feedback and survey responses (if any);
- Information about your visit to our Websites: including the source of your visit, the full Uniform Resource Locators (URL) clickstream to, through and from our Websites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number; and
- Marketing and Communications Data: including your preferences regarding receiving marketing from us and any third parties and your communication preferences.

We may also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly or indirectly reveal your identity. For example, we may

aggregate information about individuals' visits to our Websites to calculate the percentage of users accessing a specific Website page/feature in order to analyse general trends in how users are interacting with our Websites in order to help improve our Websites and service offering.

How we collect personal data

You (or your financial adviser and/or discretionary investment manager) may give us personal data about you when registering to use our platform, opening an account with us, filling in forms on our Websites, communicating with us by phone, e-mail or otherwise, carrying out transactions or making payments through our platform, signing-up for newsletters and/or uploading documents to our platform.

You will automatically provide us with Technical Data about your equipment, browsing actions and patterns when you visit our Websites. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy below for further details.

Personal data we receive from other sources

We may receive personal data about you from your personal representatives and any third party service providers you use (including, for example, legal advisers, discretionary investment managers, independent financial advisers and/or other investment product providers from whom we accept transfers of your existing investments), your employer, our business partners, sub-contractors in technical, payment and/or delivery services, advertising networks, analytics providers, search information providers and credit reference agencies. We may combine this personal data with any personal data given to us directly by you or on your behalf.

Cookies

Our Websites use cookies for security, to better understand how you use and interact with our Websites and to distinguish you from other users. This helps us to provide you with a positive experience when you visit our Websites and also allows us to improve them.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer.

By visiting a Website you automatically agree to the placement on your browser or computer of those cookies which are strictly necessary for the operation of that Website. Unless you tell us otherwise, by visiting our marketing Website you also agree to the placement of certain cookies which, while not strictly necessary for the operation of that Website, assist us in optimising the layout, performance and functionality of that Website. Please note that these cookies are currently not optional on our platform.

You can choose to block cookies which are not strictly necessary for the operation of our marketing Website by activating the setting on your browser that allows you to refuse all or some of such cookies, or via the cookie banner that appears when you access the marketing Website. However, if you block all cookies (including those which are strictly necessary for the operation of our marketing Website) you may not be able to access all or parts of that Website. If you block cookies which are not strictly necessary for the operation of our marketing Website, you should still be able to access the marketing Website but your experience of that Website may be impaired.

In addition, when we send you an email, we may track whether you have opened that email and whether you have clicked any links it may contain. This helps us measure the level and type of interaction we have generated in response to our emails. We do this by including single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect the following information about you when you open the email: your IP address, your browser and email client type or other similar details and whether you have clicked on any links embedded in the email.

How we classify the cookies we use

We use a system of cookie classification developed by the International Chamber of Commerce. This allows us to classify the different types of cookies we use on our Websites and provide you with more information about why we use them. Our cookies are categorised as follows:

- **Strictly necessary cookies:** These are cookies that are required for the operation of our Websites. They include, for example, cookies that enable you to log into secure areas.
- **Analytical/performance cookies:** These are cookies that allow us to recognise and count the number of visitors to our Websites and to see how visitors move around our Websites when they are using them. This helps us to improve the way our Websites work, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies:** These are cookies that are used to recognise you when you return to our Websites. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Uses made of personal data

We may use personal data held about you in the following ways:

- To register you on our platform, to create your platform account and to provide you with any services and/or information you request from us from time to time, including carrying out any obligations arising from any contracts entered into between you and us.
- To process transactions on your platform account (including transactions in investments, the payment of fees and charges and transfers of cash) which have been authorised by you or on your behalf by your independent financial adviser and/or discretionary investment manager.

- To manage and/or rebalance your investment portfolios to the extent we have been authorised to do so.
- To provide information to your independent financial adviser and/or discretionary investment manager.
- To provide information to third parties such as mutual fund managers, custodians, brokers, pension providers and your employer, in each case to the extent required in connection with the services we provide to you.
- To provide you with information about the products or services we offer that are similar to those that you have already purchased or enquired about and/or which we consider may be of interest to you.
- To manage our relationship with you, including dealing with any requests, complaints and queries we receive and notifying you about changes to our services, terms of business and/or this policy from time to time.
- To perform any legal and regulatory obligations required of us, such as verifying your identity when you open an account with us (including carrying out fraud and money laundering checks) and informing the authorities of any suspicious activity identified in relation to your account if required.
- To improve, administer and protect our Websites and for our internal operational purposes, including troubleshooting, data analysis, system testing and maintenance, system updates, internal research, internal reporting, statistical analysis, the improvement and development of our services and for survey purposes.
- To allow you to participate in any interactive features of our Websites or communications, when you choose to do so.
- To deliver relevant advertising to you and to measure or understand the effectiveness of such advertising.

Use of AI Tools

We use artificial intelligence (AI) tools to help us provide and improve our services. All use of AI is carried out in accordance with Data Protection Laws. We will not use your personal data to develop AI systems, nor will we process your data using AI in a way that could identify you, or that would share your confidential information with anyone else. You will continue to have all your usual rights under Data Protection Laws, including the right to access, correct, or ask us to delete your information (see 'Your rights' below).

Permitted disclosure of your personal data

We may share your personal data with any members of our corporate group. We may also share your information with selected third parties including:

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- Independent financial advisers who advise you on your investment portfolio.
 - Discretionary investment managers who manage your investment portfolio.
 - HM Revenue and Customs, the Financial Conduct Authority and other governmental or regulatory agencies.
 - Credit reference and fraud prevention agencies.
 - Companies that introduce you to us.
 - Those that we must share your personal data with in order to provide our services to you, such as mutual fund managers, custodians, brokers, pension providers, your employer and IT and SaaS service providers.
 - Analytics and search engine providers that assist us in the improvement and optimisation of our Websites.
 - Our and your professional advisers.
 - Your personal representatives.

We may also disclose your personal data to:

- a third party who acquires us or has a bona fide intention to acquire ownership interests in us or all or substantially all of our assets and to their professional advisers, provided that we shall ensure that any personal data disclosed is subject to a non-disclosure agreement and any such data is limited to that which the acquiring party needs to know in connection with the acquisition ; and
- any third party to whom we are compelled to disclose your personal data by law, regulation, court order or order of another competent authority having jurisdiction over us.
- We require all third parties to respect the security of your personal data and to treat it in accordance with applicable 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 otherwise in accordance with our instructions.

Where and how we store your personal data

We store your personal data on our secure servers in the United Kingdom and will retain it for so long as is required for the permitted uses described above or (if longer) for so long as applicable law requires or permits. 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.

We will take all steps reasonably necessary to ensure that your personal data is treated securely

and in accordance with this privacy policy and applicable law. To that end 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 who have a business need to know it or to whom we are otherwise permitted to disclose it under this privacy policy.

We have put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so within any timeframes imposed by applicable law.

Your rights

You have a number of rights in relation to your personal data, listed below:

- right to request access: you may obtain confirmation from us as to whether or not your personal data is being processed and the kind of personal data held by us and, where that is the case, you may request access to your personal data together with details of our policies and practices in relation to your personal data;
- right to request rectification: you have the right to obtain rectification of inaccurate personal data we hold concerning you;
- right to request erasure: you have the right to request the erasure of your personal data without undue delay in the following circumstances:
 - where there is no good reason for us continuing to process it;
 - where you have successfully exercised your right to object to processing (see below);
 - where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with applicable law;
- right to request the restriction of processing: you may require us to suspend the processing we carry out on your personal data in the following circumstances:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- right to object to processing and withdraw consent to processing: where we are relying on legitimate interests to process your personal data you have the right to object to such processing. However, in some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object. Where we are relying

on your consent to process your personal data, you have the right to withdraw that consent at any time. If you choose to object or withdraw your consent to our processing of your personal data, this will not impact the lawfulness of any processing carried out prior to your objection or the withdrawal of your consent. Be aware that if you object or withdraw your consent to our processing of your personal data, we may have to cancel all or part of the services we provide to you. You also have the right to object to direct marketing which uses your personal data;

- right to data portability : you have the right to request that we transfer to you or a third party your personal data in a structured, commonly used and machine-readable format. This right only applies to information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- right to lodge a complaint: you may lodge a complaint regarding our processing of your data with the Information Commissioner's Office.

You can contact us to request an exercise of your rights at any time at support@fundment.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights listed above). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or, alternatively, we may refuse to comply with your request in such circumstances.

If you wish to exercise your rights in relation to your personal data we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that your 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.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

For further information on your rights under the Data Protection Law, please see the Information Commissioner's website: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>

Changes to our privacy policy

Any changes we may make to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Changes to your personal data

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 (for example, a change of name, a change of address or a new email address).

International Transfers

We may transfer your personal data to countries outside the United Kingdom and the European Economic Area, including to service providers and partners located in other jurisdictions.

Where we do so, we ensure that your personal data is protected by appropriate safeguards in accordance with applicable data protection laws. These safeguards may include:

- reliance on adequacy regulations or adequacy decisions;
- entering into Standard Contractual Clauses approved by the UK Government or European Commission, together with the UK International Data Transfer Agreement or UK Addendum where required; and/or
- transferring personal data to organisations that are certified under the EU-U.S. Data Privacy Framework and/or the UK extension to that framework.

We take additional steps where necessary to ensure that your personal data is afforded a level of protection that is essentially equivalent to that required in the UK.

Further details about the specific safeguards we use are available on request.

Some of the third parties we work with (such as technology providers, custodians, and analytics providers) may process personal data.

Third-party links

Our Websites and marketing communications 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 Websites, we encourage you to read the privacy policy of every website you visit.