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## **PRIVACY POLICY**

This privacy policy sets out how Coop Exchange Limited uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can view the full version of the privacy policy here [LINK].

- 1. IMPORTANT INFORMATION AND WHO WE ARE** (paragraph 1)
- 2. TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU** (paragraph 2)
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- 10. CONTACT DETAILS** (paragraph 10)
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- 12. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES** (paragraph 12)
- 13. THIRD PARTY LINKS** (paragraph 13)

### **1. Important information and who we are**

This privacy policy gives you information about how Coop Exchange Limited collects and uses your personal data through your use of this website, including any data you may provide when you register with us, sign up to our newsletter or request any information or service from us.

This website is not intended for children and we do not knowingly collect data relating to children.

### **Controller**

The Coop Exchange group of companies (Group) is made up of different legal entities, these entities are

- a) Coop Exchange Limited, incorporated and registered in England and Wales (Register No: 13090619) and whose registered office is at 30 Old Bailey, London, United Kingdom, EC4M 7AU (**CEL UK**).
- b) Coop Exchange Limited, incorporated and registered in Malta (Registered No: C89967) and whose registered office is at Unit 601, Building 1, Smart City, Kalkara SCM, Malta.

- c) SGRC No.1 Limited, a company incorporated in England and Wales (Registration No. NI657922) and whose registered office is at 11 Carnbeg Avenue, Kilbegs Road, Antrim, United Kingdom, BT41 4RA.

This privacy policy is issued on behalf of the Group so when we mention "Coop Exchange Limited", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Group responsible for processing your data. CEL UK is the controller and is responsible for this website.

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact the us using the information set out in the contact details section (paragraph 10).

## 2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, employing organisation, title, date of birth and gender.
- **Contact Data** includes home address, email address and telephone numbers.
- **Technical Data** includes 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, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us (and in the case of institutional investors only - as defined in our Regulatory Notice - investment opportunities) and your communication preferences.

We 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 individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

## 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - subscribe to our service or publications;
  - request marketing or other updates to be sent to you;

- enter a survey;
- express an interest in any product or service (including any seed round); or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our analytical cookies. Please see our cookie policy below for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, for example, Identity and Contact Data collected from publicly available sources such as Companies House and the Electoral Register based inside the UK.

#### 4. How we use your personal data

##### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to, for example to determine if you are an institutional investor as defined in our Regulatory Notice. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

##### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Consent.

<p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Dealing with your requests, complaints and queries</p>	<p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation.</p> <p>(b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you).</p>
<p>To enable you to partake in a survey or other feedback.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Consent.</p> <p>(b) Necessary for our legitimate interests (to study how people use our services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for 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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To determine if we are able to include you in any investment opportunities and which enables us to comply with our legal obligations in relation to those opportunities.</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Necessary for our legitimate interests (for running our business).</p> <p>(b) Necessary for us to comply with a legal obligation.</p>
<p>To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how people use our services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing.</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To send you relevant marketing communications, subscription materials and information about us and our services and to make</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Usage</p>	<p>Necessary for our legitimate interests (to carry out direct marketing, develop our services and grow our business).</p>

personalised suggestions and recommendations to you about services that may be of interest to you based on your Profile Data.	(d) Profile (e) Marketing and Communications	
To carry out market research through your voluntary participation in surveys.	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our services).

**Direct marketing**

We will only send you updates and direct marketing material if you chose to subscribe for that material on our website.

**Third-party marketing**

It is not our intention to use your information to support any third-party marketing. If that ever changes, then please note that we will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

**Opting out of marketing**

You can ask us to stop sending you marketing communications or updates at any time by emailing [privacy@coop.exchange](mailto:privacy@coop.exchange)

If you opt out of receiving marketing communications and other updates from us, you may still receive service-related communications that are essential for administrative purposes for example relating to updates to our privacy policy, terms of use or checking that your contact details are correct.

**Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. These essential cookies are always enabled because our website won't work properly without them. They include, for example, cookies that enable you to log into secure areas of our website. You can switch off these cookies in your browser settings but you may then not be able to access all or parts of our website.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our website. 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).

We do not use tracking cookies nor do we share information for your cookies with third-parties. Our cookies only operate during your session i.e., when you are visiting our website.

## **5. Disclosures of your personal data**

We may share your personal data with parties to whom we may choose to sell, transfer, allot shares to 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 privacy policy and for the purposes set out in the table Purposes for which we will use your personal data above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the 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 in accordance with our instructions.

## **6. International transfers**

We do not share your personal data outside the UK.

## **7. Data security**

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 employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably 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 to our relationship with you.

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.

In some circumstances you can ask us to delete your data: see [paragraph 9] below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 4 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - 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.

If you wish to exercise any of the rights set out above, please contact us see Contact details (paragraph 10).

### **No fee usually required**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that 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.

### **Time limit to respond**

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.

## **10. Contact details**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: [privacy@coop.exchange](mailto:privacy@coop.exchange)
- Postal address: 30 Old Bailey, London, United Kingdom, EC4M 7AU

## **11. Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the

chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **12. Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review.

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 new address or email address.

## **13. Third-party links**

This website 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 website, we encourage you to read the privacy policy of every website you visit.