

ALIGN 17

Align17 Privacy Policy

This Privacy Policy governs the collection and use of personal data by Align17 Limited in relation to the use of our website and platform, or when we are provided with your personal data directly by you, the company that you represent or by a 3rd party. For more information about us, please visit <https://www.align17.com>. To find out more about cookies, including what cookies have been set and how to manage and delete them, please visit <http://www.allaboutcookies.org>. This Privacy Policy explains the types of personal data we collect; how we use that information; who we share it with; how we protect that information; and your legal rights. Any References to "our", "us", "we" or "Align17" within this Privacy Policy means Align17 Capital Ltd and its subsidiaries, as applicable. Please read this Privacy Policy carefully as it explains Align17's behaviours regarding your personal data.

For the purpose of applicable data protection laws, the Registered Data Controller is Align17 Limited, 1 Silk Street, London, EC2Y 8HQ, UK.

1. How we collect your information

This Privacy Policy covers all personal data collected and used by us in relation to your use of our platform and website, and in other ways you (or a person on your behalf) interact with us, such as when we are supplied with your business contact details. In this Privacy Policy, "personal data" means information that (either individually or in combination with other available information) enables you to be identified as an individual or recognised directly or indirectly. This may include your name, company name, postal address, email address, phone number, where you are based or obtaining our products or services from, details of the preferences you express to us, your comments and questions, and technical information from the devices you use to access our website and platform.

2. Information you have provided us with

Align17 will collect personal data in the process of categorising, this could include, name, address, source of wealth, knowledge and experience, net worth. Align17 may also collect personal data (such as your name, postal and email address, telephone and fax number, company, preferences, comments and questions) from you when you:

1. obtain products or services from us, typically in your capacity as a representative of your company;
2. for relevant KYC + AML procedures and / or other regulatory requirements;
3. submit any information to us in a written form;
4. create an account, engage in a transaction with us or sign up for a service;
5. are included in a distribution list supplied by the company that you represent;
6. communicate with us on a recorded telephone line or via social media; contact us, correspond with us, or otherwise provide information to us; or
7. contact us, correspond with us or otherwise provide information to us; or
8. have your information supplied to us, typically in your capacity as a representative of your company.

On occasion, you may provide personal data to Align17 about another person. You should only provide such information if you have the authorisation of the person to provide us with this information and for us to use this information as explained in our Privacy Policy.

3. 3rd party and publicly available sources

Align17 may, on occasion, work closely with 3rd parties (including analytics providers, search information providers and regulatory and industry participants or bodies), and may receive demographic and other personal data about you from those 3rd parties, which we may combine with the information you have provided to us. We process all data we obtain from such other sources in accordance with this Privacy Policy.

4. Website usage information

When you visit the Align17 website, we (and our service providers) may use cookies and other technologies to automatically collect the following information:

- 1. technical information, including your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times and download errors;
- 2. information about your visit, including the websites you visit before our website and the components of our website you viewed during your visit
- 3. the number of visits, length of visits to certain pages, pages viewed, page interaction information (such as scrolling, clicks and mouse overs) and methods used to browse away from the page; and
- 4. similar information for additional content that can be accessed from website pages, such as opening or printing pages or documents.

5. How we use your personal data

We use the personal data we collect from and about you for a variety of purposes and based on one or more legal justifications, as set out below:

Purpose	Information	Justification
To ensure that we meet our regulatory requirements	We will collect and process certain personal data (such as information on your experience and knowledge in the financial services, net worth, risk appetite, date of birth and any other data relevant to KYC, AML and other regulatory requirements.	It is in our legitimate interests to process personal data in order to categorise your client type and if relevant, onboard you as a client if you meet our criteria.

To ensure that content on our website is presented to you in the most effective manner for your computer.

We will collect and process certain personal data (such as details of your device, IP address and website usage information) to ensure that content from our website is presented in the most effective manner for you and your computer.

It is in our legitimate interests to process personal data in order to provide you with an effectively presented website.

To provide the company you represent (or you directly) with requested products or services, including potential screening and background checks as to the company's representatives, and subsequent relationship management.

We require certain personal data to provide the company you represent (or you directly) with requested products or services, including the performance of certain background checks.

Processing is necessary for the purposes of complying with legal requirements to which we are subject, performing our contractual obligations, and/or responding effectively to your requests as part of our legitimate interests.

To deal with your queries and requests, including to identify you when you contact us.

We will need to use your personal data (such as your contact details) to assist you with enquiries and requests and to identify you when you contact us.

It is in our legitimate interests to process personal data in order to provide you with an answer to your queries and requests and to meet our service obligations.

To notify you about changes to our services

We may need to process your personal data (such as your contact details) to notify you about changes to our services.

It is in our legitimate interests to process your personal details in order to notify you of changes to our service. In some instances, we may need to process information in this way to comply with laws that require us to notify you about changes in our services.

To engage or transact with you in relation to the products and services that Align17 provides.

We may need to process your personal data in the execution of a transaction involving one or

Processing is necessary for the purposes of complying with legal requirements to which we are subject, performing our contractual obligations, and/or responding effectively to your

	more of Align17's products or services.	requests as part of our legitimate interests.
To provide you with information about our products and services.	We will need to use your personal data (such as your email address or other contact details) to send you information about Align17's products and services.	We will ask for your consent before processing your information in this way when required. In addition, we will give you the option to withdraw your consent (opt out), such as in each email marketing message we send.
To design our products and services and to help us develop new services and products.	We may use your personal data to ensure that any new products and services we are developing best suit your needs.	It is in our legitimate interests to process personal data in order to more effectively design our products and improve our offering as a business.
To help identify illegal activity.	We may need to use your personal data to identify and investigate illegal or fraudulent activity.	This processing is necessary for the purposes of complying with legal requirements to which we are subject and/or managing risks to which our business may be subject as part of our legitimate interests.
To comply with our legal and regulatory requirements.	We may need to use your personal data to comply with other legal and regulatory requirements.	This processing is necessary for the purposes of complying with legal requirements to which we are subject.
To process your personal data where this is necessary to keep our website safe and secure.	We may need to process your personal data in order to keep our websites safe and secure and protect against illegal or	It is in our legitimate interests to monitor how our websites are used to detect and prevent fraud, other crimes, and the misuse of our websites. This helps us to ensure that you can safely use our

	fraudulent activity such as cyber-attacks.	websites. In some instances, we may need to process information in this way to comply with laws that require us to keep our websites safe and secure.
To keep internal records and manage our relationship with you.	We will keep records of your personal data, such as your name, address, account details and marketing preferences, in order to administer our services and products and keep our records up to date.	It is in our legitimate interest to keep records of your personal details and update these when necessary. It is also in our legitimate interests to keep records of any correspondence with you. Our customers are important to us and so we need to keep track of your details and preferences.
To allow you to subscribe to our research products or other services you're interested in, and to use this information to provide materials to which you have subscribed including email updates.	We will need to use your personal data (such as your email address or other contact details) to send you information about Align17's products or services you've asked to subscribe to and so that we can provide you with personalised email experience.	It is in our legitimate interests to process personal data in order to provide you with a tailored answer to your queries and requests.
To keep an up-to-date suppression list where you have asked not to be contacted.	We understand that you may prefer for us not to contact you with details of our products and services. We keep records of your preferences to ensure that we do not contact you if you have asked us not to. We may need to process and hold certain personal data (such as your name and email address) in order to do this.	It is in our legitimate interests as we, pursuant to good marketing practice, are obliged to process personal data to maintain an up-to-date suppression list and ensure that we do not contact you where you have asked us not to.

When relying on the legitimate interest basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant 3rd party with your interest and fundamental rights and freedoms in relation to the protection of your personal data, to ensure it is appropriate for us to rely

on legitimate interests and to identify any additional steps we need to take to achieve the correct balance.

The provision of your personal data is necessary when data is needed for the purposes of entering into or servicing a contract that you, or a company you are associated with, has with Align17, or to receive the products, services or information you or your company request, or to comply with any applicable laws and regulations.

Refusal to provide us with your information would make it impossible for us to provide the products, services or information requested, or to fulfil our contractual obligations.

6. Sharing your personal data

Your personal data is intended for use by Align17 and may be shared with its subsidiaries, affiliates and 3rd parties under certain circumstances. Our website may, from time to time, contain links to and from the websites of our subsidiaries, affiliates and 3rd parties. If you follow a link to any of these websites, please note that these websites have their own privacy notices and that we have no control over how they may use your personal data. You should check the privacy notices of third party websites before you submit any personal data to them. We may share your personal data with the following third party organisations

7. Subsidiaries of Align17 Capital Ltd

We may share your personal data with our subsidiaries, in order to administer our products and services, provide you with support, understand your preferences, send you information about products and services that may be of interest to you, and conduct the other activities described in this Privacy Policy.

8. External Auditors & Lawyers

We may share your personal data with our auditors and legal advisers.

9. Competent Authorities

We may share your personal data with competent authorities including the FCA and HMRC.

10. Law Enforcement Agencies

We may share your personal data with relevant law enforcement agencies and other judicial bodies.

11. Our service providers

We may use other companies or contractors to perform services on our behalf or to assist us with the provision of Align17's products or services to you. We may share your personal data with the following categories of service provider:

1. Infrastructure and IT service providers;
2. Corporate events and hospitality providers (where you have accepted an invitation from us);
3. Providers of administrative services for Align17's products or services, including accountants, custodians, banks and securities' pricing providers
4. Connected parties, in the event that you have engaged with Align17 in relation to a transaction involving one or more of our products and / or services.

In the course of providing such services, these service providers may have access to your personal data. However, we will only provide our service providers with the information that is necessary for them to perform the services, they will act under our instructions and we ask them not to use your personal data for any other purpose. We will always use our best efforts to ensure that all the service providers we work with will keep your personal data secure.

12. Your company and other 3rd parties connected with your company or its account

We may transfer your personal data to your company, such as when you are included on an email with others or to confirm your details or role with your company. We also may transfer your information to 3rd parties connected with your company or its account, such as a consultant used by your company or its trading partners. The transfer of personal information to other countries is based on a business need or to comply with applicable laws. Personal information stored or processed in a foreign jurisdiction may be accessed under a lawful order made in that jurisdiction.

13. 3rd parties connected with business transfers

We may transfer your personal data to 3rd parties in connection with a reorganisation, restructuring, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your personal data in a manner consistent with this Privacy Policy.

14. Storing your personal data

We use reasonable measures to safeguard Personal Data from theft, unauthorized use, disclosure, or modification. We aim to maintain appropriate physical, procedural and electronic safeguards to protect your Personal Data.

15. Your rights and freedoms

You have various rights in connection with our processing of your personal data, each of which is explained below. If you wish to exercise one or more of the below rights, please contact us with your request at mydata@align17.com and include your name, email and postal address, as well as your specific request and any other information we may need in order to provide or otherwise process your request.

The rights described below only relate to your personal data.

Access

You may have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We are required to consider the interests of others, so this is not an absolute right.

Rectification

You may have the right to rectify inaccurate or incomplete personal data concerning you.

Deletion

You may have the right to ask us to erase personal data concerning you. We are not obligated to do so if

we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

Restriction

In limited circumstances, you may have the right to request that we restrict processing of your personal data. This may apply where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

Portability

You may have the right to ask to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

Objection

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data.

Withdrawing Consent

If we are processing your personal data on the basis of your consent, you have the right to withdraw your consent at any time. If you would like to withdraw consent, including if you would like to opt out of receiving marketing correspondence from us, please contact us at mydata@align17.com.

If you opt out of or unsubscribe from receiving promotional correspondence from us, we may still contact you in connection with an account, relationship, activities, and other communications with us.

Make a Complaint

You also have the right to lodge a complaint with the UK Information Commissioner's Office (the 'ICO').

16. Retaining your personal data

Align17 will only retain your personal data for as long as it is necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to promptly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject). The FCA stipulates that authorised firms must retain certain personal and sensitive information, provided by their clients for the purposes of providing investment services, for a specified period of time. This information may be retained by the firm in both digital and hardcopy form for the purposes of evidencing retention to the FCA.

Align17's Data Retention Policy is to retain all client information (including any personal and sensitive data you have provided during the course of our relationship) in compliance with the maximum retention period as currently stipulated by the FCA. In practice, this means that Align17 will retain your information for a minimum period of 7 years from the date that our relationship with you ends.

17. Storage of your information during the Retention Period

During the retention period, your information will continue to be available in our internal systems to enable Align17 Staff to deal with any queries that you may have. Align17 may decide to archive any hardcopy information you have provided at any time during the Retention Period. We are required to ensure that any physical archiving facilities comply with such data protection laws that may be in force from time to time.

18. Extension of the Retention Period

Align17 may, from time to time, elect to retain some or all of your information for a period in excess of 7 years. We may elect to retain your information for longer than the 7 years specified in our Retention Policy for the following reasons:

1. Regulatory changes require us to extend the Retention Period
2. For the purposes of investigating a complaint
3. To comply with a request from a competent authority (FCA / HMRC etc.)
4. At our discretion, Align17 elects to extend the Retention Period
5. You ask us to retain your personal information

19. Deletion of your information

Subject to the Retention Period of your information not being extended, Align17 will delete any personal and sensitive information that we hold (digital and hardcopy), retaining only such limited information that we require to establish that you have been, from time to time, a client of the firm. We retain these limited records to ensure that you are not contacted by Align17 in the event that you have exercised your right to be forgotten or withdrawn your consent to receive ongoing communications from Align17.

20. Security of your data

We have implemented technical and organisational security measures in an effort to safeguard personal data in our custody and control. Such measures we have implemented include, limiting access to personal data only to employees, contractors and authorised service providers who need to know such information for the purposes described in this Privacy Policy.

21. Changes to our Privacy Policy

We reserve the right to change our Privacy Policy from time to time. If we decide to make a material change to our Privacy Policy, we will endeavour to make you aware of that fact by, for example, notifying you of these changes via email and/or posting an alert on the home page of our website.

22. Contact us

If you have any questions in relation to this Privacy Policy or other data protection matters, please contact us via email at mydata@align17.com