

1. BACKGROUND

Last updated: 8 November 2024

- 1.1 This notice (**Privacy Notice**) tells you how we look after your personal data when you visit our website as a customer or business contact at www.financial-studio.com (**Website**).
- 1.2 This notice sets out what information we collect about you, what we use it for and whom we share it with. It also explains your rights under data protection laws and what to do if you have any concerns about your personal data.
- 1.3 We may sometimes need to update this Privacy Notice, to reflect any changes to the way our goods and services are provided or to comply with new business practices or legal requirements.
- 1.4 We do not knowingly collect or solicit personal information from children under 13. If we become aware that we have collected personal information from a child under 13, we will delete it immediately.

2. WHO WE ARE AND OTHER IMPORTANT INFORMATION

- 2.1 We are FINANCIAL STUDIO LTD, including any of its subsidiaries, a company registered in United Kingdom under company registration number 14490076. Our registered office is at 112-114 Witton Street, Northwich, England, CW9 5NW (**we, us or our**).
- 2.2 For all visitors to our Website and for users who purchase our goods and services through a third party organisation, we are the **data controller** of your information (which means we decide what personal data we collect and how it is used).
- 2.3 Financial studio is neither registered nor regulated by the Financial Conduct Authority (FCA).
- 2.4 We are registered with the Information Commissioner's Office (**ICO**), the UK regulator for data protection matters, under number ZB572381.
- 2.5 We also have affiliates, set out below, who may have access to your personal data as part of our group of companies. These affiliates are integrated into our operations and adhere to the same data protection policies and practices as Financial Studio:
 - 2.5.1 COMAVE GLOBAL S.À.R.L, a company incorporated in Luxembourg with company number B268594 and whose registered address is situated at 33 Rue du Puits Romain, L-8070 Bertrange, Luxembourg (**ComAve**);
 - 2.5.2 Tamias GLOBAL LTD, a company incorporated in England and Wales with the company number 14806934 and whose registered address is situated at 112-114 Witton Street, Northwich, England, CW9 5NW (**Tamias**); and
 - 2.5.3 Libra Incentix sp. z o o, a company incorporated in Poland with company number 0001076589 and whose registered address is situated at Łódź (94-306) at ul. Piotrkowska 116, app. 52, Poland (**LIX**).

3. CONTACT DETAILS

- 3.1 If you have any questions about this Privacy Notice or the way that we use information, please contact our Data Protection Officer using the following details:

Email: dpo@financial-studio.com

Address: The DPO Centre Ltd., 50 Liverpool Street, London, EC2M 7PY

4. THE INFORMATION WE COLLECT ABOUT YOU

4.1 **Personal data** means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect, and where we receive it from, below.

4.2 Type of personal data:

- Identity Data: your first and last name.
- Contact Data: your email address, telephone numbers, home postal address.
- User Information: Passwords (encrypted),
- Device Information: Device model, Device token

5. HOW WE USE YOUR INFORMATION

5.1 We are required to identify a legal justification (also known as a lawful basis) for collecting and using your personal data. There are six legal justifications which organisations can rely on. The most relevant of these to us are where we use your personal data to:

- fulfil our **contract** with you;
- comply with a **legal obligation** that we have;
- pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy); and
- do something for which you have given your **consent**.

5.2 Below is set out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed below, we will update our Privacy Notice.

5.2.1 Contract

- To administrate or perform our contract with you, for example to process orders and set up accounts.
- To process your payment information in connection with any contract we have with you, for example to process refunds when authorised.
- To send you updates about the services you have bought (e.g. confirmation of order, arrival time).

5.2.2 Legal Obligation

- Where we send you information to comply with a legal obligation (e.g. where we send you information about your legal rights).
- Where we retain information to enable us to bring or defend legal claims.
- Where we are legally obliged to, for example to send records of tax and payments to HMRC in the UK.

5.2.3 Legitimate Interests

- Recording your preferences (e.g. marketing) to ensure that we comply with data protection laws
- Where using your information is necessary to pursue our legitimate business interests to:
 - a) improve and optimise our Website;
 - b) to send you updates about products and services where requested or to process feedback provided by customers;
 - c) enhance security and prevent fraud on our Website; and
 - d) ensure the proper functioning of our Website;

Where we use your information for our legitimate interests, we have assessed whether such use is necessary and that such use will not infringe on your other rights and freedoms.

5.2.4 Consent

- Where you have provided your consent to providing us with information or allowing us to use or share your information.
- Where you have consented to receive marketing material from us.

5.3 Where we need to collect your personal data (for example, in order to fulfil a contract we have with you), failure to provide us with your personal data may mean that we are not able to provide you with the services. Where we do not have sufficient information about you to fulfil an order, we may have to cancel the service ordered or contact you to ask for further details.

6. WHO WE SHARE YOUR INFORMATION WITH

6.1 We share (or may share) your personal data with:

- **Our supply chain:** other organisations that help us provide our goods. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations.
- **Regulatory authorities:** Government authorities such as HM Revenue & Customs or the Police where legally required to do so.
- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business.

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any Personal Data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the purposes for which it was originally collected by us.

If we were asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

7. WHERE YOUR INFORMATION IS LOCATED OR TRANSFERRED

7.1 We store your personal data on our servers in Ireland. We have proper mechanisms in place to ensure that transfer to that country is in compliance with relevant data protection laws.

7.2 Except as set out above, we will only transfer information outside of the UK or EEA where we have a valid legal mechanism in place to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located. For further information please contact our Data Protection Officer using the details set out in this notice.

8. HOW WE KEEP YOUR INFORMATION SAFE

8.1 We have implemented appropriate security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication (including multi-factor authentication);
- internal IT and network security;
- staff policies and training;
- breach reporting processes;
- business continuity and disaster recovery processes;

9. HOW LONG WE KEEP YOUR INFORMATION

- 9.1 Where we act as the controller, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.
- 9.2 To decide how long to keep personal data (also known as its retention period), we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm to you if an incident were to happen, whether we require the personal data to achieve the purposes we have identified or whether we can achieve those purposes through other means (e.g. by using aggregated data instead), and any applicable legal requirements.
- 9.3 We may keep Identity Data, Contact Data and certain other data (specifically, any exchanges between us by email or any other means) for up to seven years after the end of our contractual relationship with you.
- 9.4 If you browse our Website, we keep personal data collected through our analytics tools for only as long as necessary to fulfil the purposes we collected it for.
- 9.5 If you have asked for information from us or you have subscribed to our mailing list, we keep your details until you ask us to stop contacting you.

10. YOUR LEGAL RIGHTS

- 10.1 You have specific legal rights in relation to your personal data.
- 10.2 We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. Usually there is no cost for exercising your data protection rights, but we may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive. If this happens, we will always inform you in writing.
- 10.3 We will respond to your legal rights request without undue delay, but within one month of us receiving your request or confirming your identity (whichever is later). We may extend this deadline by two months if your request is complex, or we have received multiple requests at once. If we need to extend the deadline, we will let you know and explain why we need the extension.
- 10.4 We do not respond directly to requests which relate to personal data for which we act as the processor. In this situation, we forward your request to the relevant controller and await their instruction before we take any action.
- 10.5 If you wish to make any of the right requests listed below, you can contact the Data Protection Officer at dpo@financial-studio.com.
- 10.6 Your rights include:
- **Access:** You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'.
 - **Correction:** You can ask us to correct your personal data if it is inaccurate or incomplete.
 - **Erasure:** You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

- **Restriction:** You can ask us to restrict how we use your personal data and temporarily limit the way we use it. The right is not absolute and only applies in certain circumstances.
- **Objection:** You have the right to object to our processing of some or all of the personal data that we hold about you. This is an absolute right when we use your data for direct marketing but may not apply in other circumstances where we have a compelling reason to do so, e.g., a legal obligation.
- **Portability:** You can ask us to send you or another organisation an electronic copy of your personal data.

Complaints: If you are unhappy with the way we collect and use your personal data, you can complain to the ICO or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage. Please contact us at dpo@financial-studio.com.

11. WHEN WE SEND YOU MARKETING MESSAGES

- 11.1 If you have consented to receiving marketing messages from us, you can opt out of these at any time. Just let us know at dpo@financial-studio.com. You can also do this by clicking the unsubscribe link from any of the marketing emails that we send to you.
- 11.2 We market our goods and services to prospective and existing business customers; this is known as Business-to-Business Marketing (**B2B Marketing**). We may send marketing communications to their staff via work contact details. If you are a member of staff and do not wish to receive B2B Marketing, please let us know at dpo@financial-studio.com.
- 11.3 Opting out of marketing will not affect our processing of your personal data in relation to any order you have with us and where we are required to use your personal data to fulfil that order or provide you with certain information.

12. PROFILING

- 12.1 Personal data will not be used for profiling or other automated decision-making.

13. HOW TO CONTACT US

- 13.1 If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: dpo@financial-studio.com

By post: The DPO Centre Ltd., 50 Liverpool Street, London, EC2M 7PY

This Policy was last updated in September 2024