

In this Policy, unless specified otherwise, words and phrases shall have the same meanings as specified in AutoSL™ Services Terms and Conditions.

BEHAVIOURAL FINANCE LTD, a company incorporated in Scotland (No. SC643760) and having its Registered Office is at Verdant, 2 Redheughs Rigg, Edinburgh, Scotland, EH12 9DQ understands that your privacy as a is important to you and that you care about how your personal data is used and shared online. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when creating an account. If you do not accept and agree with this Privacy Policy, you must stop using Our Software immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

- “Cookie”** means a small text file placed on your computer or device by Our Software when you visit certain parts of Our Software and/or when you use certain features of Our Software. Details of the Cookies used by Our Software are set out in Part 14, below;
- “Cookie Law”** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003; and
- “We/Us/Our”** means the said Behavioural Finance Ltd (as above).

2. Information About Us

- 2.1 Our Services are owned and operated by Us.
- 2.2 Our Data Protection Officer is: James Evans
- 2.3 Email address: dpo@behaviouralfinance.co.uk

3. What Does This Policy Cover?

- 3.1 This Privacy Policy applies only to Our use of data gathered by Us in your use of Our Services.

4. What Is Personal Data?

- 4.1 Personal data is defined by the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) (where applicable in relation to the storage retention and processing of EU personal data), the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the “UK GDPR”), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and the Data Protection Act 2018 (collectively, “**the Data Protection Legislation**”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.
- 4.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name

and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you as an individual have the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 15.
 - b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
 - c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 15 to find out more.
 - d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 15 to find out more. (We only hold personal data for certain periods of time, as explained in Part 8 but if you would like Us to delete it sooner, please contact Us using the details in Part 15). Please note that deletion of certain personal data may prevent Our Software from functioning;
 - e) The right to restrict (i.e. prevent) the processing of your personal data.
 - f) The right to object to Us using your personal data for a particular purpose or purposes.
 - g) The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
 - h) The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
 - i) Rights relating to automated decision-making and profiling. For more information please see Part 7.
- 5.2 For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 15.
- 5.3 It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.
- 5.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- 5.5 If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.
- 5.6 We would welcome the opportunity to resolve your concerns Ourselves, however, so please contact Us first, using the details in Part 15. If We are

unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office details of which can be found here <https://ico.org.uk/>.

6. What Data Do We Collect and How?

6.1 Depending upon your use of Our Software, We collect and hold some or all of the personal and non-personal data set out below, using the methods also set out in the table. Please also see Part 14 for more information about Our use of Cookies and similar technologies.

6.2 We will not request, collect, retain, store or process any Special Category or Criminal Conviction data when providing Our Services. Special Category data is:

- a) personal data revealing racial or ethnic origin;
- b) personal data revealing political opinions;
- c) personal data revealing religious or philosophical beliefs;
- d) personal data revealing trade union membership;
- e) genetic data;
- f) biometric data (where used for identification purposes);
- g) data concerning health;
- h) data concerning a person's sex life;
- i) personal data pertaining to children (any person under the age of 18 years); and
- j) data concerning a person's sexual orientation.

6.3 Criminal Conviction data is:

- a) personal data relating to criminal convictions and offences or related security measures including:
 - i) criminal activity;
 - ii) allegations;
 - iii) investigations;
 - iv) proceedings.
 - v) unproven allegations
 - vi) information relating to the absence of convictions.
 - vii) personal data about penalties;
 - viii) conditions or restrictions placed on an individual as part of the criminal justice process; or
 - ix) civil measures which may lead to a criminal penalty if not adhered to.

Data Collected	How We Collect the Data
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Name	On sign up
Email address	On sign up
Sign up code	On sign up
Financial information including financial documents	During usage

2. How Do We Use Your Personal Data?

2.1 Under the Data Protection Legislation, We must always have a lawful basis for using personal data. The following table describes how We may use your personal data, and Our lawful bases for doing so:

What We Do/ Lawful Basis/ requirement for collecting personal data	What Data We Use
Providing and managing your access to Our Services.	Email address
Personalising and tailoring your experience on Our Services.	Email address, Sign up code
Administering Our Services.	Email address
Supplying Our Services.	Email address
Personalising and tailoring Our Services.	Email address, Sign up code, Name
Communicating with you.	Email address, Name
Supplying you with information that you have opted-in-to (you may opt-out at any time by unsubscribing using the links provided in Our emails.	Email address

2.2 With your permission and/or where permitted by law, We may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on Our products and Software. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

2.3 We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the

original, please contact Us using the details in Part 15.

- 2.4 If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.
- 2.5 In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.
- 2.6 We use AutoSL for carrying out certain kinds of decision-making. If at any point you wish to query any action that We take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact Us to find out more using the details in Part 15.
- 2.7 The following automated decision-making method(s) may be used as part of the Services:

Generation of output documents based on the information and documents you provide Us with.

3. How Long Will We Keep Your Personal Data?

We do not keep personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

We retain personal data pertaining to you for as long as We have an Agreement with you and for a period of 3 years thereafter. Data will then be deleted or anonymised.

4. How and Where Do We Store or Transfer Your Personal Data?

- 4.1 We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.
- 4.2 The security of your personal data is essential to Us, and to protect your data, We take a number of important measures, including the following:
 - a) limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
 - b) procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where We are legally required to do so;
 - c) We use industry best practices and regular staff training to ensure your data is stored correctly.

5. Do We Share Your Personal Data?

- 5.1 If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.

- 5.2 In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 5.3 We may share your personal data with other companies in Our group for administration and company management purposes. This includes subsidiaries.
- 5.4 We sometimes contract with the following third parties to process data to supply certain products and software and process data on Our behalf as part of the Services:

Recipient	Activity Carried Out	Sector	Location of Data
Microsoft Azure	Storing and processing data	IT	UK
Zendesk	User support	IT	UK

- 5.5 If any of your personal data is shared with a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law, as described above in Part 9.
- 5.6 If any personal data is transferred outside of the UK/European Union, We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK/European Union and under the Data Protection Legislation, as explained above in Part 9.

6. How Can I Control My Personal Data?

- 6.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Software, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails).
- 6.2 You may also wish to sign up to one or more of the preference Software operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these Software will not prevent you from receiving marketing communications that you have consented to receiving.

7. Can I Withhold Information?

- 7.1 You may restrict Our use of Cookies. For more information, see Part 14.

8. How Can I Access My Personal Data?

- 8.1 If you want to know what personal data We have about you, you can ask Us

for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

- 8.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.
- 8.3 There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.
- 8.4 We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

9. How Do We Use Cookies?

- 9.1 Our Software may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Software. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 9.2 All Cookies used by and on Our Software are used in accordance with current Cookie Law.
- 9.3 Before Cookies are placed on your computer or device, you will be shown a pop-up at the top of the page titled ‘Cookies on AutoSL’ requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Software may not function fully or as intended.
- 9.4 Certain features of Our Software depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 14.5. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 14.6, but please be aware that Our Software may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 9.5 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Consent	Tracks your consent to use cookies	yes

Session	This is used for basic features and functionality and will be stored on your machine for the duration of the session of use of the website.	yes
Anti Forgery	Used to prevent CSRF (Cross-Site Request Forgery) attacks and will be stored on your machine for the duration of the session of use of the website.	yes
ARRAffinity/ARRAffinitySameSite	ARRAffinity/ARRAffinitySameSite Used to protect the functionality of your session.	yes

9.6 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

9.7 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Software more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

10. How do you Contact Us?

10.1 To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: dpo@behaviouralfinance.co.uk.

Postal Address: Behavioural Finance Ltd., Verdant Building, Edinburgh EH12 9DQ

11. Changes to this Privacy Policy

11.1 We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

Any changes will be immediately posted to the Software. If the changes materially affect the way in which We collect, process, retain or store your personal data, you will be required to accept these revised Terms. Any minor changes will be deemed to have been deemed to have been accepted on your first use of Our Software following the minor alterations. We recommend that you check this page regularly to keep up-to-date.