Privacy Policy

1. INTRODUCTIONThe Investing Collective Ltd (TICL) is committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 2018 ("the Act"), the data controller is The Investing Collective Ltd (company number **14910451**) of Woodside, Kimpton, Andover, SP11 8PH.

Our nominated representative for the purpose of the Act is James Glover. 2. INFORMATION WE MAY COLLECT FROM YOUWe may collect and process the following data about you:

• Information that you provide by filling in forms on our site, and which may be amended from time to time ("our site"). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site.

- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.

• Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

3. IP ADDRESSESWe may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

4. COOKIESFor the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. Some of the cookies we use are essential for the site to operate. For detailed information on the cookies we use and the purposes for which we use them see our Cookies Policy for more information.

5. WHERE WE STORE YOUR PERSONAL DATAThe data that we collect from you may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK or the EEA working for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely, in accordance with your rights and in accordance with this privacy policy. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6. USES MADE OF THE INFORMATIONWe use information held about you in the following ways:

• To ensure that content from our site is presented in the most effective manner for you and for your computer. To administer our site or subscription services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

• To provide you with information, products or services that you request from us or which we believe may interest you based on the data you give us or your preferences, or where you have consented to be contacted for such purposes, such as a whitepaper or an invitation to an event.

• To carry out our obligations arising from any contracts entered into between you and us.

• To allow you to participate in interactive features of our service, when you choose to do so.

• To notify you about changes to our service, your subscription or our contract with you.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post, email or telephone.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you using methods appropriate to the data you have submitted to us or the data we hold.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please contact James Glover using the details set out in paragraph 12 below. Please note, if you request a whitepaper prepared by, or an invitation to an event, hosted by a third party, we will pass your details to that third party to fulfil your request.

7. HOW WE PROTECT YOUR DATAWe have put in place security procedures and technical and organisational measures to safeguard your personal information. Access to all internal data servers is limited to the specialist data protection personnel and is controlled via active directory authentication using defined policies to control password expiry and renewal.

8. DISCLOSURE OF YOUR INFORMATIONWe may disclose your personal information to any member of our Group. We may also disclose your personal information to third parties under the following circumstances:

• business partners, suppliers and sub-contractors for the performance of any contract we enter into with you including in relation to the supply of information or invitations to events;

• business partners and suppliers where you have agreed to this;

• in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

• if TICL or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

• if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our rights, to view our terms and conditions of use and other agreements; or to protect the rights, property, or safety of TICL, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. **9. HOW LONG WE WILL KEEP YOUR DATA**We will keep your data all

the time you have a current subscription or contract with us.

We may keep data you provide us for 24 months. We may keep other data about you for 36 months.

10. YOUR RIGHTSYou have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can

exercise your right to prevent such processing by ticking certain boxes on the forms we use at the time we collect your data or at any other time. You also have the right to:

- request access to, deletion of or correction of, your personal data
- restrict or object to processing your personal data

• withdraw your consent where the processing was based on that consent, but note that this does not affect any processing not based on your consent

- request we transfer your personal data to another person
- complain to our nominated representative in which case we will follow our internal complaints procedure

In each case described above, please contact James Glover using the details set out in paragraph 12 below.

You can also complain to the Information Commissioner's Office or other relevant supervisory authority.

11. EXTERNAL LINKSOur site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

12. ACCESS TO INFORMATIONYou have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact James Glover either by email to **jglover@theinvestingcollective.com** or by post at The Investing Collective Ltd, Woodside, Kimpton, Andover, SP11 8PH.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to us changes, for example if you change your email address or name, please let us know the correct details by writing to James Glover as above. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

13. CHANGES TO OUR PRIVACY POLICYAny changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

14. HOW TO CONTACT USQuestions, comments and requests regarding this privacy policy are welcomed and should be addressed to James Glover at jglover@theinvestingcollective.com or by post at The Investing Collective Ltd, Woodside, Kimpton, Andover, SP11 8PH.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at jglover@theinvestingcollective.com.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: <u>https://www.ico.org.uk</u>