

Privacy Notice

This policy is effective from 01 August 2019 (updated on 12 October 2021)

1. Introduction

- This Privacy Notice explains what we do with information that we may hold about you from which you can be identified (your "personal data").
- It describes how we collect, use, and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your rights.
- This notice applies to individuals who visit, or use the service through one of our websites listed below in section 3
- For the purpose of applicable data protection legislation, the company responsible for your personal data is The Big Exchange (TBF) Limited. ("The Big Exchange", "TBE", "us" or "we").
- We may amend this Privacy Notice from time to time. Please visit this page if you want to stay up to date as we will post any changes here.

Your privacy is really important to us. If you are dissatisfied with any aspect of this Privacy Notice or our handling of your personal data, please contact us using the details set out in section 9 below.

2. What kind of personal information do we collect?

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

We may collect, use, and store parts of your personal data in such as:

- **Data on your identity.** This includes, but is not limited to, your name, date of birth, gender, other identifiers, address, email address, telephone number, National Insurance number and other contact information
- **Financial data.** This may include your bank account details, payment card details and bank address.
- **Profile data.** This will include your username and or password.
- **Usage data.** How you use our website(s), your activity and the ongoing use of our products and services.
- **Marketing preferences.** This refers to storing your preferences for opting in or out of receiving marketing and sales communications from us. To provide you with regular email updates you may provide consent for us to collect and use your personal data. For those communications, we collect and use your personal data, namely your name, account number and email address. For marketing purposes you can opt out

We may also aggregate data to give an overall picture of how a group of individuals behave when using our products and services. While this aggregated data does not reveal who you are or any personal information,

3. How we collect your personal data?

We use different ways of collecting your personal data. We may collect data directly when you:

- Sign up and consent to receiving email updates from us.
- Create an account and register to use the goods and services provided by TBE.
- Get in touch with us directly, through our Contact Us feature.
- When you communicate with us, which could include, but is not limited to, providing us with some feedback, contacting customer service or reporting a fault.

We may collect data indirectly through Google Analytics or other automated technologies to understand more about your interactions with our service. You can find more detail on this in Section 9.

In the normal course of business, we do not collect any data about you from external sources save that we may receive such data from our contracted service providers in the course of providing services to you.

The websites which we own as at the time this document was last updated are as follows:

- www.bigexchange.com
- www.tbeinvestor.com
- www.bigexchangeinvest.com

4. How we use your personal data?

We will use your personal data as the law permits us to. We are careful about the way in which we use it. The most common reason for us to use your personal data is to provide you with the goods and services you request through using The Big Exchange.

Furthermore, we may use your personal data:

- To provide you with any services and/or information you request from us
- To inform our business decisions, and to deliver a relevant and personalised experience.
- To comply with legal, compliance or regulatory obligations.
- To prevent and detect financial crime, fraud, money-laundering or other crime
- To improve the quality of the services that we offer and to train our internal teams.
- To let you know about any material changes we make to our service, product offering or terms and conditions.
- To confirm your identity and address, which may include using automated systems when we carry out bank account verification or financial crime checks.
- To tailor and customise our services, communications, and marketing for you.
- For internal reporting, the monitoring of customer service, and the reporting of management information to our teams
- For recording and storing any phone conversation or communication, be it written, digital or otherwise that you may have in connection with us.

We may also use your personal data to satisfy your request to subscribe to our email updates. These updates will provide you with information about the latest news about our services.

5. Who do we share your personal data with?

We do not share or sell your personal data with any external third parties for their own purposes and so you will not receive any communications from third parties as a result of giving us your personal data.

The website(s) may contain links to external, third-party websites over which we have no control, clicking on these links may allow third parties to collect or share your data.

Whenever you visit a new website, it is good practice to read and understand the privacy notice or policy to understand what is happening to your personal data.

We may need to share appropriate personal data with our contracted service providers as part of providing our goods and services., most commonly to allow them to provide individuals with custody and execution services as customers of The Big Exchange and/or help us to prepare and send you, our communications.

However, we do not allow these organisations to use your personal data for their own purposes and take care to ensure that they keep your personal data secure, only permitting them to use personal data for specified purposes, and to delete it when it is no longer needed.

6. How do we protect your personal data?

We care about protecting your personal data. That's why we put in place appropriate security measures, including encryption techniques, which are designed to prevent any misuse of the data that you provide to us.

If you suspect any misuse, loss, or unauthorised access to your personal data please let us know immediately using the contact details set out in section 10 below. We will investigate the matter and update you as soon as possible on next steps.

7. How long do we keep your personal data for?

We will not keep your personal data for longer than is necessary for the purpose of providing you with the goods and services that you have requested, and such additional period as may be required by Applicable Law and Regulations. Please find more information on this within our Terms and Conditions

That means, for example, that we would keep your personal data for the length of time for which we are providing you with email updates. If you become a customer, we would stop sending you marketing information when you opt-out or are no longer a customer, but may need to hold your data for an additional period as may be required by Applicable Law and Regulations

Furthermore, if you contact us to unsubscribe from our email updates, we will delete your personal data from our database unless we believe that we are required by law to keep the data

(for example, because of a request by a tax authority or in connection with any anticipated litigation).

Our contracted service providers who provide the custody of assets and execution of trades, may be obliged to hold the relevant personal details of all customers even after closure of accounts for a period as defined by Applicable Laws and Regulations. Please find more information on this within our [Terms and Conditions](#).

8. Your rights

The law provides that you have various rights in relation to the personal data that we hold about you. We have described these rights below.

A) Right to object

This right enables you to object to us processing your personal data where we do so to send you direct marketing materials. If you object to the processing of your data, then we will not be able to provide you with the goods and services on The Big Exchange nor continue to send you direct marketing communications.

B) Right to withdraw consent

Where you have consented to us processing your personal data (for example, to send you email updates), you may withdraw this consent at any time. If you withdraw your consent then we will not be able to continue to send you our email updates unless we consider that there is an alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition. To withdraw consent, please click unsubscribe on any email from us or email us at enquiries@bigexchangel.com.

C) Right of access

You may ask us to confirm what personal data we hold about you at any time, and request us to modify, update or delete such information. If we provide you with access to the personal data we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies from us, we may charge you a reasonable administrative cost.

Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so.

D) Right to be forgotten

You have the right to request that we "erase" your personal data in certain circumstances. For example, where you have withdrawn your consent to us processing your personal data, and there is no other valid reason for us to continue processing. We would only be entitled to refuse to comply with your request in certain limited circumstances. For example, to enable us to exercise or defend a legal claim or to meet the requirements of applicable laws and regulations.

E) Right to restrict processing

You have the right to request that we restrict our processing of your personal data in certain circumstances. If you exercise this right, we will be able to continue to store your data on our

database, but we will not be able to do anything else with it until either the issue is resolved, you consent, or further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest. We will, of course, notify you before lifting any restriction on processing your personal data.

F) Right to rectification

You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you.

G) Right of data portability

If you wish, you have the right to transfer your personal data between organisations. In effect, this means that you are able to transfer your personal data to a third party. To allow you to do so, we will provide you with your data in a commonly used format so that you can transfer the data to a third party of your choice. Alternatively, we may directly transfer the data for you.

H) Right to lodge a complaint with a supervisory authority

You also have the right to make a complaint to your local supervisory authority which is the Information Commissioner's Office. You can contact them in the following ways:

- Phone: 0303 123 1113 •
- Email: casework@ico.org.uk
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

If you would like to exercise any of these rights, please contact us using the details set out in section 10 below. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

9. Cookies and IP addresses

We may obtain information about your computer, which includes your IP address, browser type and operating system where available. This accumulation of data is used to assist system administration.

We may also collect information regarding your browsing activity and interests through use of a cookie file. This cookie file is stored on the hard drive of your computer and contains information that is transferred to your computer's hard drive. We use the collection of this data to help us improve the experience of users on our website, and to deliver a more personalised service with more relevant content. The collection of this data allows us to:

- store data indicative of your preferences, allowing us to adjust our website to appeal to your individual interests;
- estimate the size and usage patterns of our audience;
- record the details of any transactions carried out by you through our website;
- identify you upon your return to our website; and/or
- increase the speed of your searches.

We use the following cookies:

- Analytical/performance cookies. They 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.

You can find more information about some of the individual cookies we use and the purposes for which we use them below. Example of cookies that we use:

Tool	Cookie Purposes
Google Analytics	<p>We use Google Analytics to collect information about how visitors use the site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. For more information about Google's privacy policy, please visit https://www.google.com/intl/en/policies/ .</p> <p>If you do not wish to allow the use of Google Analytics cookies at all, Google provides an optout plug-in for most common website browsers https://tools.google.com/dlpage/gaoptout .</p>

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. You remain entitled to refuse cookies by adjusting your browser settings accordingly. Doing so however may restrict your access to certain areas within our website. Unless you adjust your browser settings to refuse cookies, our system will issue cookies when you log on to our website.

10. Contact us

TBE is responsible for processing your personal data. If you have any comments or suggestions concerning this Privacy Notice, please contact us using the details set out below. We take privacy seriously and will get back to you as soon as possible.

enquiries@bigexchange.com

11. Legal bases for us processing your data

There are several different ways that we are lawfully able to process your personal data. We have set these out below.

Where you give us your consent to process your personal data

We rely on your consent to process your personal data. In order to be valid:

- You must give us your consent freely, without us putting you under any type of pressure;
- You must know what you are consenting to – so we'll make sure we give you enough information;

- You should only be asked to consent to one processing activity at a time – we therefore avoid "bundling" consents together so that you don't know exactly what you're agreeing to, and;
- You need to take positive and affirmative action in giving us your consent – as part of our sign-on process, we ask you to tick a box giving consent.

You have the right to withdraw your consent to our processing of your personal data at any time. Details of how to do so can be found in section 8 and 10 above.