



FiNCH

Important information and who we are

Finch Global is the controller and is responsible for your personal data (referred to as "we", "us" or "our" in this policy).

If you have any questions about this privacy policy, please contact us using the details set out below.

Contact details

Our full details are:

- Company name: **Finch Global, 20 Birchin Lane, London, EC3V 9DU, UK**
- Email address: **info@finch.global**

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues or other competent supervisory authority of an EU member state if you are based outside the UK.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

This version was last updated on **10/01/2020**. It may change and if it does, these changes will be posted on our website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

The data we collect about you

We may collect, use, store and transfer your first name, surname, email address, phone number, gender, date of birth, country of residence and photograph.

If we are going use your data for onboarding validation this is what you need to know.

We will use your data for the purposes of onboarding validation as part of Know Your Customer processes. We have a legal obligation to carry out this process and will need to store this data for as long as you hold an account with us and for 5 years after that (as required by our regulators).

We may process your photographs using facial recognition technology. As this processing is sensitive, we rely on your consent.

Processing of your data may also involve automatic decision making and profiling. This means processing your photographs, address by automated means to verify that you are who you say you are. Without such verification we cannot provide you with our services. In order to carry out automatic decision making and profiling we rely on your consent.

Where the processing of your data does not involve facial recognition technology, automatic decision making or profiling, then such processing is undertaken on the basis that we have a legal obligation to carry out this validation.

Disclosures of your personal data

We may disclose your personal data to service providers acting as processors who provide IT and system administration services.

If we choose to sell, transfer or merge part or all of our business or assets, your personal data may be disclosed to our advisers and any prospective purchaser and its advisers, as necessary for the legitimate interest of assessing the transaction. Your personal data may also be transferred following such sale, merger or transfer so that the new owners may use your personal data in the same way as set out in this privacy policy.

Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data. Note however that we have a regulatory duty to retain your information which may override your right to request erasure.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable



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format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time in a situation where we might rely on consent to process your personal data. In order to do so you can email us at **info@finch.global** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

