

INGOT PORTAL LIMITED

PRIVACY POLICY

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1. Introduction

This is the privacy policy of Ingot Portal Limited ("Ingot Portal", "us" or "we"), which applies to all personal data we process.

Privacy policies are also sometimes referred to as a 'privacy notices' or 'fair processing notices'.

We are committed to protecting and respecting your privacy. This policy explains the types of personal data we collect, how we use that information, who we share it with, how we protect that information, and your legal rights in relation to your personal data.

This policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy at: www.ingotportal.com/privacy-policy.

2. About this policy

This policy governs the collection and use of personal data by Ingot Portal. This includes any personal data you may provide as part of any contract you enter into with us, any personal data you provide (or is available to us) through your use of our portal and which we may obtain from other sources.

When we refer to personal data in this policy, this means any information about an individual from which that person can be identified. More detail about this is set out in section 6.

It is important that you read this policy together with any other privacy notice (or 'fair processing' notice) we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This policy supplements any such other notices and is not intended to override them.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the Data Protection Officer using the contact details set out at the bottom of this policy.

This version of the privacy policy is effective as of **12 July 2021**.

3. Who we are

For the purpose of applicable data protection laws, the controller of your personal data is Ingot Portal Limited, whose registered office is at 157 Regent Road, Liverpool, Merseyside L5 9TF. For more information about Ingot Portal please see: www.ingotportal.com.

4. Keeping your information up to date

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes at any time, by contacting the Data Protection Officer using the contact details set out at the bottom of this policy.

5. Changes to this policy

We reserve the right to amend this policy at our sole discretion, without prior notice to you. We will notify you of any such changes (including when they will take effect). Your continued use of our services or our portal following the posting of changes to these terms means that you consent to those changes (but this does not affect your rights set out in section 14).

6. Information covered by this policy

This policy covers all personal data collected and used by Ingot Portal.

In this policy "personal data" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This may include information such as your name, title, date of birth, gender, postal address, email address(es), telephone number(s) and computer IP address.

The different types of data we may collect are referred to below. We use these terms elsewhere in this policy to cover the type of personal data referred to:

- **Identity Data** – which may include your first name, surname and title.
- **Contact Data** – which may include your home or business address, email address(es), website address; telephone number(s) and fax numbers.
- **Contractual Data** – which may include includes details of the existence of (and the terms and conditions applicable to) any contract we have with you and details about the services we have contracted to provide to you.
- **Employment Data** - includes details of your job, your position or job title and where you work (including your company details).
- **Financial Data** – which may include your bank account details, any applicable VAT number, details of your income and any applicable business turnover.
- **Technical Data** – which may include your internet protocol (IP) address, internet browser type and version, operating system and device, platform and other technology used to access our portal.
- **Usage Data** – which may include information about how you use our portal and services.
- **Marketing Data** - which may include your preferences in receiving marketing information from us and your communication preferences.

7. Collection of personal data

We may collect personal data about you from different sources detailed below.

Information you give us:

Unless expressly stated below, you are not bound by any contractual or statutory obligation to provide personal data to us. However, if you choose to enter into a contract with us (including for the purposes of accessing our portal) then we will need certain information for the purposes of entering into and performing that contract (which may include personal data) and we may not be able to conclude a contract with you without that information.

When you access our portal, when you correspond with us by phone or email or other electronic means and when you enter into a contract with us or order our services, you may give us information about yourself.

The information you give us may include your name, any applicable business name, postal address, email address, telephone number(s), details of your employment status, income and finances and/or other personal data referred to in this policy. This includes personal data you provide when you:

- enquire about our services;
- enter into a contract with us to provide our services;
- ask us for details of third-party services that we may promote from time to time;
- subscribe to our publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Information we collect about you:

With regard to each of your visits to our portal, we may also use cookies and other technologies to automatically collect the following information:

- technical information, including your internet protocol (IP) address, internet browser type and version, time zone settings, operating system and platform and other technology used to access our portal; and
- information about your visit, including login dates and times, identification and security information, user agent and pages visited.

We collect the above information by using cookies, server logs and other similar technologies connected to our portal. Our portal also use cookies to distinguish you from other users. This helps us to provide you with a good experience when you access the portal and also allows us to improve it. For detailed information on the cookies we use and the purposes for which we use them, please see our cookie policy at: www.ingotportal.com/cookie-policy.

Information we receive and collect from other sources:

We may obtain certain information about you from third party service providers, from government organisations or publicly available sources.

The different kinds of personal data about you which we may collect and process from third parties are:

- Identity Data, Contact Data, Employment Data and Financial Data from credit insurers and other credit reference agencies we use.
- Technical Data and Usage Data from analytics providers (such as Google), search information providers and social media providers.
- Identity Data, Contact Data, Employment Data and Financial Data from government organisations or publicly available sources such as Companies House, HMRC, electoral registers and social media providers.

Other information and uses:

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Such aggregated data may be derived from your personal data but is not considered personal data in law (as this data does not directly or indirectly reveal your identity). For example, we

may aggregate your Usage Data to calculate the percentage of users accessing a specific portal feature. However, if we combine or connect any such aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

We do not collect any sensitive personal information (which the law refers to as ‘Special Categories of Personal Data’). This means information such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), plus information about criminal convictions or offences.

8. How we use your personal data

We will only use your personal data when the law allows us to. Each basis on which we are lawfully permitted to process your personal data is known as the ‘legal basis’ for processing.

The purposes for which we may use your personal data and the types of legal basis that we will rely on to process your personal data are set out in the table below. Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data (as shown in the table). Where more than one is shown, please contact us if you would like details about the specific legal basis we are relying on to process your personal data.

Purpose/Activity	Type of data	Legal basis for processing
To register you as a new customer.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Employment Data 	<ul style="list-style-type: none"> • Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.
To undertake credit checks in respect of you or your business.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Employment Data 	<ul style="list-style-type: none"> • Processing undertaken with your consent. • Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.
To administer and perform any services you have ordered.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Contractual Data 	<ul style="list-style-type: none"> • Processing undertaken with your consent. • Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.

<p>To manage our relationship with you, which will include administration of your contract, notifying you about changes to our terms or privacy policy and dealing with your enquiries or complaints.</p>	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Employment Data • Contractual Data • Marketing Data 	<ul style="list-style-type: none"> • Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract. • Necessary for our legitimate interests (to keep our records updated, to study how customers use our services, to manage your account and to deal with your enquiries or complaints). • Necessary to comply with a legal obligation.
<p>To administer and protect our business and our portal (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Technical Data • Usage Data 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, including our dealings with third party service providers we deal with, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or restructuring exercise). • Necessary to comply with a legal obligation.
<p>To use data analytics to improve our portal, services, marketing, customer relationships and experiences.</p>	<ul style="list-style-type: none"> • Technical Data • Usage Data 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of customers for our services, to keep our portal updated and relevant, to develop our business and to inform our marketing strategy).
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you.</p>	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Technical Data • Marketing Data 	<ul style="list-style-type: none"> • Processing undertaken with your consent. • Necessary for our legitimate interests (to develop our services and grow our business).

<p>To comply with legal requirements (including where you exercise any of your rights referred to in this policy), to exercise our legal rights and to bring or defend legal claims.</p>	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Contractual Data • Marketing Data • Technical Data • Usage Data 	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation. • Necessary for our legitimate interests to exercise our legal rights and to bring or defend legal claims.
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We will only use your personal data for the purposes shown above. If we need to use your personal data for a different purpose, we will update this policy and notify you of the change before starting any such new processing.

Please note that in some circumstances we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. Transfers of personal data

We may have to share your personal data with the parties set out below for the purposes shown:

- any member of our group of companies; and
- third parties such as:
 - service providers (acting as our data processors) who provide haulage services, shipping services, freight services, customs services, accounting services and other services in connection with the services which we provide to you;
 - service providers (acting as our data processors) who provide us with services relating to IT, hosting and other infrastructure and IT system administration, market research, marketing (including competitions), advertising, communications, training, payment processing and data cleansing and processing services;
 - credit reference agencies or credit insurers;
 - professional advisers (acting as our data processors) including lawyers, bankers, accountants, auditors and insurers based who provide legal, banking, accounting, auditing and insurance services to Ingot Portal;
 - HM Revenue & Customs and other government authorities, for the provision of our services to you and for purposes required by law; and
 - the police and fraud prevention agencies, for the purposes of crime detection and prevention.

We may also disclose your personal data to third parties:

- 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 we are under a duty to disclose or share your personal data in order to comply with any legal

obligation, to enforce our contracts, or to protect our rights, property or safety.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Our third-party service providers (to the extent they are acting as our data processors) are contractually bound to use personal data only to perform the services that we have engaged them to provide and they are only permitted to process your personal data in accordance with our instructions.

Please note that some of the third parties we share your personal data which are based outside the United Kingdom (UK), so their processing of your personal data will involve a transfer of data outside the UK. Please see section 10 about data being processed outside of the UK.

10. Where we store your data

Usually your personal data will be stored in the United Kingdom (UK). However, some of our external third-party service providers are based outside the UK, so your personal data may be transferred to a destination outside of the UK. This means it may also be stored and processed at a destination outside of the UK, including by staff operating outside the UK who work for one of our service providers.

Whenever we transfer your personal data to our service providers outside of the UK, we ensure a similar degree of protection is afforded to it as applies within the UK, by ensuring that certain minimum legal safeguards are met or implemented. We take all steps that are mandatory or reasonably necessary to ensure that your personal data is treated securely and in accordance with applicable data protection laws.

In some instances, we are required by law to disclose personal data to third parties which are based outside the UK (such as overseas government authorities or regulators). In those circumstances, the third parties will not be acting as our data processors and therefore we are not responsible for securing the protection mentioned above.

Please contact us if you want further information about the circumstances in which we transfer your personal data out of the UK or the safeguards we use.

11. How long we store your data for

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of the periods for which we retain different aspects of your personal data are set out in our Data Retention Policy at www.ingotportal.com/data-retention-policy.

In some circumstances, you can ask us to delete your data. Please see section 14 regarding 'Your Rights' for further information.

12. Security of your personal data

We use administrative, technical, and physical measures to safeguard personal data against loss, theft and unauthorised uses, access or modifications. Our staff and our third-party service providers are under a duty to process your personal data only in accordance with our instructions and they are

subject to a duty of confidentiality regarding your personal data.

Where we have given you (or where you have chosen) a password to use to access our portal, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

We have put in place procedures to deal with any suspected personal data breach. We will notify you and any applicable regulator of any breach where we are legally required to do so.

13. Third party websites and apps

Our portal may contain links to and from third party websites and we may provide you with details of apps provided by third parties. Please note that if you follow a link to any of these websites or download an app, these websites and apps will have their own terms of use and privacy policies and that we do not accept any responsibility of liability for these policies. Please check these terms and policies before you submit any personal data to these websites or apps.

14. Your rights

You have the rights set out below with respect to the personal data that we hold about you. To exercise any of these rights, you should contact us by using the contact details set out at the bottom of this policy.

You will not normally have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity when you seek to exercise any of your rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to help clarify the scope of your request.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Your right to access the personal data we hold about you

You have the right to ask us whether or not we process your personal data and to request information on the purposes of data processing as well as confirmation on whether we use your personal data for these purposes only.

In some circumstances, we may not be able to give you access to the personal data we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety).

You also have the right to be informed of the third parties to which we transfer your personal data within the scope of this policy.

Your right to have your personal data corrected

You can contact us to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

Your right to erasure of your personal data

You can ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law.

Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, after you make your request.

Your right to request restriction of the processing of your personal data

You may ask us to suspend the processing of your personal data:

- if you want us to establish the accuracy of the personal data;
- where our use of the personal data is unlawful but you do not want us to erase it;
- where you need us to hold the personal 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 personal data but we need to verify whether we have overriding legitimate grounds to use it.

We will inform you when you decide to lift any such restriction on processing.

Your right to object to us processing your personal data

You have the right to ask us to stop processing your personal data:

- for direct marketing (including any profiling we undertake for the purposes of direct marketing);
- where the processing is based on legitimate interests (including any profiling we undertake to send you personalised offers, service recommendations and similar content) 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. We will comply with your right to object in these circumstances, unless:
 - we can demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms; or
 - the processing is for the establishment, exercise or defence of legal claims.

Where you no longer wish to be contacted for direct marketing purposes, you can easily unsubscribe from our marketing communications at any time by following the instructions included in those marketing communications.

If you have consented to receive offers or marketing communications directly from any third parties, please note that those third parties (not us) are responsible for taking account of your rights, including your right to opt-out of receiving offers or marketing communications from them.

Where we are relying on your consent to process your personal data, you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Your right to object to automated decision making

You have the right not to be subject to a decision which is based exclusively on automated processing and produces a legal effect or a similarly significant effect on you. In these circumstances, you are entitled to obtain human intervention, express your point of view and obtain an explanation of the decision and challenge it. However, this right does not apply if the automated decision is necessary for entering into or performance of a contract between you and us, is authorised by law or is based on your explicit consent.

Please note, however, that we do not undertake any such automated processing.

Your right to have your personal data transmitted to another organisation

Where we process personal data about you which:

- has been provided by you directly to us; and
- is processed by automated means; and
- is processed with your consent or for the performance of a contract with you,

you have the right to ask us to provide you with the personal data we hold about you in a structured, commonly used and machine-readable format or, where technically feasible, to transmit that data to another organisation.

Making a complaint

You have the right to lodge a complaint to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk), if you believe that we have not complied with applicable data protection laws. You also have a right to claim damages if processing of your personal data violates applicable data protection law.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

15. Contacting us

If you have any questions about this policy, or if you wish to exercise your rights as referred to in this policy, please contact us by:

- writing to us at:
Lynsey Morrison, Data Protection Officer
Ingot Portal Limited
Suite 321, Cotton Exchange Building
Old Hall Street
Liverpool
L3 9LQ

or:

- emailing our Data Protection Officer by sending an email to: lynsey.morrison@ingotportal.com.