

# Privacy Policy

Effective Date: 31 JULY 2017

## 1. Purpose and Scope

This Privacy Policy sets out information, guidelines and requirements to ensure that SETL Development Limited protects all personal data and complies with applicable data protection laws and regulations. By visiting <https://setl.io/> you are accepting and consenting to the practices described in this policy.

This Policy also sets out the purposes for which we Process your Personal Data and the obligations that we are under when Processing your Personal Data.

This Policy applies to all customers and clients of SETL Development Limited and individuals who contact us about our services.

## 2. Definitions

For the purposes of this Policy, the following terms have the following meanings:

**Data Controller** means the person who determines the purposes and means of Processing Personal Data. SETL Development Limited, a company incorporated in England under company number 09704844 whose registered office is 5 Fleet Place, London, England, EC4M 7RD is the Data Controller of your Personal Data.

**Personal Data** includes any data which relates to a living individual who can be identified, directly or indirectly, from that data. Examples of personal data are a person's name, address, date of birth, photographs, telephone numbers, email addresses, passport details and bank information. These examples are not exhaustive.

**Processing or Process** means any operation performed on Personal Data, whether manually or by automated means. It includes collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Sensitive Personal Data** includes data that relates to an individual's racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data in order to uniquely identify a person, physical or mental matters concerning health, sexual orientation/life and criminal records, offences or alleged offences. The collection and processing of Sensitive Personal Data demands extra care and except in very limited cases, express consent is required before Processing.

## 3. Processing Personal Data

We may Process your Personal Data if it is necessary to comply with any legal obligation to which we are subject to or where necessary for the purposes of our legitimate business interests (and in certain other limited circumstances). In practice, this means that we will process your Personal Data for one or more of the following purposes:

- for administration purposes;
- to perform research and make statistical analyses and behavioural analyses – subject to your consent for such processing;
- to create customer profiles and to analyse your purchasing preferences – subject to your consent for such processing;
- for marketing purposes —subject to your consent for such processing;
- to detect and prevent fraud – subject to your consent for such processing;
- for security vetting purposes;
- to improve the services;
- for back-up data and business continuity management;
- for security of our systems;

- for legal and regulatory compliance, including audits, inspections and responding to requests from legal or regulatory authorities;
- for dispute resolution and pursuing legal rights and remedies; and
- for corporate and commercial matters, including for the purposes of negotiating transactions with potential counterparties.

We may Process any or all of your Personal Data such as name, business address; e-mail and telephone number.

We do not use cookies. We do not process your Sensitive Personal Data.

Where necessary for the purposes mentioned above, we may share or disclose Personal Data about you to any of the following recipients:

- affiliates of SETL Development Limited and staff of those companies, including employees, agents, contractors and other individuals employed and/or retained by those companies who require access to the Personal Data to fulfil the purposes set out above;
- professional advisers and auditors;
- local or foreign regulators, governments and law enforcement authorities and ombudsman
- local or foreign courts, tribunals and arbitrators or other judicial committees; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving SETL Development Limited (including any potential or actual purchasers and their advisers).

#### **4. Storage of Personal Data**

We will hold your Personal Data on our systems and Process it for as long as is necessary for the relevant activity. If you ask us to delete your Personal Data from our systems, we will take reasonable steps to do so.

#### **5. Your rights in respect of Personal Data**

As a customer, you have the right:

- to request confirmation as to whether SETL Development Limited holds your Personal Data;
- to access your Personal Data being Processed by SETL Development Limited and to certain information about the Processing of that Personal Data;
- to require SETL Development Limited to rectify any inaccurate or incomplete Personal Data about you;
- to require SETL Development Limited to erase Personal Data about you in certain circumstances; and
- to restrict SETL Development Limited from Processing Personal Data about you in certain circumstances.

Please direct all requests under this section to SETL Development Limited on the contact details set out below.

#### **6. Security of Personal Data**

We will regularly review the security of Personal Data. The following security measures are in place:

- only authorised people can access, alter, disclose or destroy the personal data;
- those people will only act within the scope of their authority; and
- if the personal data is accidentally lost, altered or destroyed, it can be recovered to prevent any damage or distress to the individuals concerned.

We ensure that our staff is provided with training in relation our security policy and importance of protecting personal data. All computers and servers are protected by encryption and the database containing the Personal Data requires a separate log in password and username.

#### **7. For more information**

If you have any questions in relation to this Policy, or for further information, please contact **LEGAL@SETL.IO**