

## PRIVACY POLICY

AIM Associates Limited (the “Company” “we”, “us”) respects your right to privacy. This Privacy Policy (“Policy”) applies to personal information that we collect through our website at [www.legion-pay.com](http://www.legion-pay.com) as well as any other related sites and applications. This Policy does not apply to websites operated by other organizations and other third parties. The Policy also applies to personal information that we collect when you use or interact with our services through any correspondence made with us by phone, e-mail or otherwise. The Policy aims to inform you about the type of information we gather, who we share it with, what we use it for, how we keep it secure and what your data privacy rights are.

### What personal information do we collect and why?

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

You may give us your identity, contact and financial data etc. by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal information you provide when you:

- Apply for our products or services
- Create an application on our website
- Subscribe to our or related third party service or publications
- Request marketing to be sent to you
- Enter a competition, promotion or survey
- Give us some feedback

In addition to above, certain parts of our website may ask you to provide personal information voluntarily (for example, we may ask you to provide your contact details in order to register an application with us, to subscribe to marketing communications from us, and/or to submit enquiries to us). The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

### Information that we collect automatically

When you visit our website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area (EEA), this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (for example, country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy.

### **Information that we obtain from third party or publicly available sources**

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

We use the information we receive from these third parties to enhance the services we provide to you, such as providing curated content that is relevant to services we provide you or topics you are interested in.

### **Who do you share my information with?**

We may disclose your personal information to the following categories of recipients:

- third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- to any other person with your consent to the disclosure.

### **Lawful basis for processing personal information**

Our lawful basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect vital interests.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

### **Purpose for which we use your personal information**

#### **A. Serving you as a client**

Purpose:

- Onboarding you as a new client
- Delivering products and services to you
- Setting you up and providing you access to our trading platform
- Responding to your queries

Lawful basis:

- Performance of a contract with you
- Legitimate interest

#### **B. Administration of our business**

Purpose:

- Stress testing our systems
- Reviewing our services
- Conducting audits
- Collection of money owed to us
- Test new products and services

Lawful basis:

- Performance of a contract with you
- Legal obligation
- Legitimate interest

C. Financial crime prevention, responding to regulators and legal claims

Purpose:

- To be compliant with applicable laws and regulations
- To respond to complaints
- To detect, investigate, report and prevent financial crime

Lawful basis:

- Legal obligation
- Legitimate interest
- Prevention of fraud, money laundering, financial crime and safeguarding public interest

D. Marketing

Purpose:

- Carry out marketing activities
- Provide guidance about our products and services

Lawful basis:

- Legitimate interest to better understand our client
- Develop new products
- Explore new mark segments

**How do you keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. In particular, we:

- Hold personal information in secure facilities and where the information is held electronically, on secure servers.
- Use encrypted transmission links.
- Use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control unauthorised access to systems and data.

- Regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.
- Restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations.

### **Data retention**

Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this Privacy Policy (unless longer retention is required by law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review. We may keep an anonymised form of your personal information, which will no longer refer to you without time limits, to the extent that we have a legitimate and lawful interest in doing so.

### **Cookie preference**

Some of the cookies that we set when you visit any of our websites are essential to the working functionality of the site. Performance cookies are another type of cookies we use to provide with you a better user experience and to improve how content on our website is presented. Marketing are also set usually by third party advertising networks to ensure we are providing you with targeted adverts more relevant to you and your interests.

### **Your rights**

Subject to certain conditions, data protection law provides individuals with rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant information protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

- Right to obtain a copy of your personal information. You have the right to obtain a copy of the personal information we hold about you.
- Right to rectification. You may request that we rectify any inaccurate and/or complete any incomplete personal information. We will then correct our records, and notify any third parties to whom such personal information may have been transmitted as described above.
- Right to data portability. You may request a copy of all personal information you have provided to us after which we will transmit those data to another data controller of your choice.
- Right to opt-out of marketing communications. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- Right to withdraw consent. You may withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential.



- Right to object to processing. You may request that we stop processing your personal information. Please note you may not be able to benefit from certain service features for which the processing of your personal information is essential.
- Right to erasure. You may request that we erase your personal information and we will comply, unless there is a lawful reason for not doing so.
- Your right to lodge a complaint with the supervisory authority. We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority directly. To contact the Information Commissioner's Office in the United Kingdom, please visit the ICO website <https://ico.org.uk/make-a-complaint/> for instructions.

If you wish to exercise any of these rights, please contact us via email to [info@legion-pay.com](mailto:info@legion-pay.com)

#### **Future updates to our Privacy Policy**

We may update this Policy from time to time in response to changing legal, technical or business developments.