

PRIVACY POLICY

How we use and protect your personal data. Last updated: 16 Ferbruary, 2022

Who we are

AS FINANCIAL LIMITED (“we”, “our”, “us” or “AS FINANCIAL LIMITED”) is committed to protecting and respecting your privacy. Our data protection officer, for the purpose of applicable data protection law, is Mr David Horton, who may be contacted at david.horton@as-financial.com. If you have any questions or would like to discuss further, you can email us or call us on: +44 7903 873291

Registered office address: Elm Yard, 10 - 16 Elm Street, London, England, WC1X 0BJ

Company number: 06951009

You can find more information about us you can mail us at david.horton@as-financial.com

In drafting the provisions of the Privacy Policy, the organization has taken particular account of the requirements of Regulation 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation" or "GDPR"), the 2011 EU Regulation on the Right to Information Self-Determination and Freedom of Information. CXII of 2013 ("Information Act"), Act V of 2013 on the Civil Code ("Civil Code") and Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Commercial Advertising Activities ("Act XLVIII of 2008") and The Data Protection Act 2018 of United Kingdom.

Our commitment and obligations to you

We take the collection, usage and security of your personal data seriously. We can only use your personal data under law if we have a good reason for doing so. The law provides examples of those reasons. These include:

- To perform or fulfill a contract we have with you; or
- If we have a legal duty; or
- If it is within our legitimate business interest; or

- If there is a public interest reason for doing so; or
- If you have given your consent.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Types of personal data we collect about you

- Contact details of customers or customer connected parties such as name, phone number, number of children etc.
- Demographic data (e.g. date of birth)
- Complaints information
- Technical Information (IP / Cookies)
- Location Data
- User login data if required in future when we launch our own website
- Legal data (e.g. power of attorney)

What personal data we collect and where from

You may give us information about you when filling in forms on our Facebook or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, address, email address, phone number, and personal description about the customer and/or the responsible party of the customer.

IMPORTANT: For data privacy reasons, we will only collect information from you directly or via your authorized representative who has confirmed that they are authorized to provide this information on your behalf. The data will be loaded into a Google spreadsheet using a CRM system so that they will be involved in the data processing.

Information we collect about you

Once we launch our website in future with regard to each of your visits to our website, we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) click stream to, through and from our site (including date and time); products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-over's), cookies and methods used to browse away the page and any phone number used to call our customer service number.

Information received from other sources:

- We may receive information from other sources, such as from your authorized representatives for the purpose of providing services to you. The information received may include: names, address details, etc.

Automated decision making

We do not use automated decision-making processes during our relationship with you. Applications and decisions are always reviewed manually.

What do we use your personal information for?

What we use your personal data for	What is the lawful reason	Business or commercial reason (our legitimate interest)
Provide the customer with care services	Perform the contract we have with you (or take steps needed at your request prior to	Yes

	entering into a contract with you)	
Maintain customer relationships	Perform the contract we have with you (or take steps needed at your request prior to entering into a contract with you)	Yes
Match you with a client	Perform the contract we have with you (or take steps needed at your request prior to entering into a contract with you). Where we need to use or share your sensitive personal data to match you with a client.	Yes
Communicate with potential and existing customers for marketing purposes	With your consent	Yes
Providing and improving quality of services to customers	This is within our legitimate business interests to perform	We review data to ensure we provide customers with the best possible service
To analyse website use and improve services	This is within our legitimate business interests to perform	We carry this to enhance our website services and ensure that it meets the best user experience to provide our customers with the best journey possible.
Marketing and site metrics performance	With your consent	Yes
Email marketing	With your consent	Yes

Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to delete or turn off all cookies. You do this through your browser settings.

If you disable cookies installation or you delete cookies from your computer's hard disk you may be unable to use some of the features of our website, products and services.

Cookie Settings

By agreeing to accept our use of cookies, you are giving us, and third parties we partner with, permission to place, store, and access some or all the cookies described below on your computer.

Strictly Necessary Cookies

These cookies are necessary for proper functioning of the website, such as displaying content, logging in, validating your session, responding to your request for services, and other functions. Most web browsers can be set to disable the use of cookies. However, if you disable these cookies, you may not be able to access features on our website correctly or at all.

Performance Cookies

These cookies collect information about the use of the website, such as pages visited, traffic sources, users' interests, content management, and other website measurements.

Functional Cookies

These cookies enable the website to remember a user's choices – such as their language, user name, and other personal choices – while using the website. They can also be used to deliver services, such as letting a user make a blog post, listen to audio, or watch videos on the website.

Media Cookies

These cookies can be used to improve a website's performance and provide special features and content. They can be placed by third parties who provide services to us or by our company.

Advertising or Targeting Cookies

These cookies are usually placed and used by advertising companies to develop a profile of your browsing interests and serve advertisements on other websites that are related to your interests. You will see less advertising if you disable these cookies.

Session Cookies

These cookies allow websites to link the actions of a user during a browser session. They may be used for a variety of purposes, such as remembering what a user has put in their shopping cart as they browse a website. Session cookies also permit users to be recognized as they navigate a website so that any item or page changes they make are remembered from page to page. Session cookies expire after a browser session; thus, they are not stored long term.

Persistent Cookies

These cookies are stored on a user's device in between browser sessions, which allows the user's preferences or actions across a site (or, in some cases, across different sites) to be remembered. Persistent cookies may be used for a variety of purposes, including remembering users' choices and preferences when using a website or to target advertising to them.

We may also use cookies for:

- Help remember and process for the financial advice

- Allowing you to share content with social networks
- Affiliate marketing
- Allowing you to post comments (When we launch our website)
- Identifying the areas of our website that you have visited (When we launch our website)
- Personalizing content that you see on our website (When we launch our website)
- Understand and save user's preferences for future visits. (When we launch our website)
- Keep track of advertisements
- Remarketing our products or services to you
- Remembering your preferences, settings, and login details (When we launch our website)
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. (When we launch our website)
- We may also use trusted third-party services that track this information on our behalf.

Most web browsers can be set to disable the use of cookies. However, if you disable cookies, you may not be able to access features on our website correctly or at all.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>. Our payment services providers may also send you cookies.

You may disable cookies by changing the settings on your browser. However, if you do so, this will affect your enjoyment of our site and we will no longer be able to offer you a personalised service.

Web Beacons

We may also use a technology called web beacons to collect general information about your use of our website and your use of special promotions or newsletters. The information we collect through web beacons allows us to statistically monitor the number of people who open our emails. Web beacons also help us to understand the behavior of our customers, members, and visitors.

E-mail marketing and newsletters

We may make suggestions and recommendations to you that we think may be of interest to you or members of your team / organisation. We will only contact you by electronic means (email) with information about services similar to those which you have shown an interest in.

We may also use your data, or permit selected third parties to use your data, to provide you with information about services which may be of interest to you and us or they may contact you about these by electronic means only if you have consented to this.

You have the right to ask us not to process your information for marketing purposes. You can exercise your right to prevent such processing by ticking the relevant boxes on the forms we use to collect your information, or you can opt out of receiving future marketing communications from us at any time by following the directions contained in the marketing email to unsubscribe. You can also exercise this right at any time by contacting us at david.horton@as-financial.com.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

How we share your personal data

We take your privacy very seriously and we'll only share your information where:

- we need to for the purposes of providing you with products or services you have requested;
- we have a public or legal duty to do so e.g. to assist with detecting fraud and tax evasion, economic crime prevention, regulatory reporting, litigation or defending legal rights;
- we have a legitimate reason for doing so e.g. to manage risk, or assess your suitability for services; or
- we have asked you for your permission to share it, and you've agreed.

Third parties

We may share with third parties, including:

- business partners, suppliers and subcontractors for the performance of any contract we enter into with them or you;
- fraud prevention agencies who will use it to prevent fraud and to verify your identity;
- provided you have consented; marketing, market research, advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimization of the website;
- any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries for the purposes set out above;
- if AS FINANCIAL LIMITED or substantially all of its assets are acquired by a third party, in which case personal data held by it about its members and customers will be one of the transferred assets.

Sharing aggregated or anonymised data

Where we have made your information anonymous, we may share it outside of AS FINANCIAL LIMITED with partners such as research groups, advertisers or connected sites. For example, we may share information publicly to show trends about the financial services market.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”), including, in particular, the United States. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or business partners. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Security of your personal data

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of the data transmitted to our site; any transmission of your data is at your own risk. Once we have received

your information, we will use strict procedures and security features to try to prevent unauthorized access.

Our site may, from time to time, contain links to and from the websites of our member and associate member organizations, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

How long we keep your information

We will retain your personal information for as long as you use our services and for a reasonable time thereafter. After you have terminated your use of our services, we will retain your personal information for up to 10 years and thereafter may store it in an aggregated and anonymised format.

Your rights

- Access to information. The Data Protection Laws give you the right to access information held about you. Your right of access can be exercised in accordance with Data Protection Laws by contacting us at david.horton@as-financial.com.
- Consent. You may withdraw your consent to any processing of your personal data at any time by contacting david.horton@as-financial.com.
- Rectification. You have the right to rectify any personal data held about you that is inaccurate. Your right of rectification can be exercised by contacting us at david.horton@as-financial.com
- Erasure. You may have the right to erasure of personal data held about you by contacting us at david.horton@as-financial.com
- Complaints. In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at david.horton@as-financial.com and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the UK's Information Commissioner's Office.

Changes to our Privacy Policy

Any changes we may make to the Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check this page frequently to see any updates or changes to this Privacy Policy.

Right to rectification and data quality

You have the right to have personal data rectified if it is inaccurate, or completed if it is incomplete.

Right to erasure including retention and disposal

You have the right to be forgotten and can request the erasure of personal data when:

- it is no longer necessary for the purpose originally collected/ processed for;
- you withdraw consent where consent is the lawful basis for processing;
- we are relying on legitimate interests as the basis for processing, and you object to the processing of your data, and there is no overriding legitimate interest to continue this processing;
- we are processing the personal data for direct marketing purposes and you object to that processing;
- it was unlawfully processed;
- it has to be erased in order to comply with a legal obligation; or
- it is processed for information society services to a child.

MPA may refuse to comply with a request for erasure if we are processing the personal data for the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation; or
- to exercise or to defend legal claims.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to david.horton@as-financial.com .