

Privacy Notice

This Privacy Notice sets out how **AU Vaults Ltd** collects, uses and protects your personal data.

Introduction

There may be times when you trust us with personal data. We respect your privacy and are committed to protecting your personal data. This is why our policy is to take steps to ensure that your data and privacy rights are protected and to be clear about our personal data practices.

The purpose of this privacy notice is to explain what data we collect, how we use it when we interact with you or when you sign up for products or services that we offer regardless of where you visit it from. It also sets out how you can control or limit how we use your data, as well as your privacy rights and how the law protects you.

This website and the products are not intended for children and we do not knowingly collect personal information about children under 13 years old.

Important information and who we are

AU Vault Ltd (company number 14538418) is the controller and responsible for your personal data (collectively referred to as "AU Vault", "we", "us" or "our" in this privacy notice). If you have any questions about this privacy notice or our data practices, you can contact us on the information below:

Email address: info@auvault.com

Postal address: 7 Bell Yard, London, WC2A 2JR

UK Information Commissioner's Office Registration Number: ZB566650

Updates

We keep our privacy practices under regular review and reserve the right to update this privacy notice from time to time. If we make any material changes, we will notify you by email (sent to the email address if provided) or by presenting you with a new version of this privacy notice on the website.

Please check our privacy notice posted on our website for the latest version.

Complaints

You will always have the right to make a complaint at any time with a supervisory body if you think we have not followed data protection rules. In the UK, this is the Information Commissioner's Office (ICO) (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. If you are based in another jurisdiction, you may have additional rights or ability to refer matters to an alternative supervisory body.

Third party links

Where our services or website includes any links to third-party websites, plug-ins or applications, clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party sites, plug-ins or applications and are not responsible for their privacy statements

or practices. When you leave our website or services, we encourage you to read the privacy notice of every site you visit.

Personal Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect personal data about you in a variety of ways. Sometimes we collect the personal data directly from you and at times we may receive personal data about you from other sources and third parties. We also collect personal data automatically when you interact with our website.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact Data** includes name, address, email address and telephone numbers. In limited cases we will take location data (at country level) as well.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website together with information on how you use our website or services.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes any preferences you have for receiving marketing from us and our third parties.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect 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 privacy notice.

We do not knowingly collect any **Special Category of Personal Data** about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information or genetic and biometric data. We also do not collect criminal conviction or offences data.

How is your personal data collected

We use different methods to collect data from and about you. The main way we will collect your personal data is through your direct interactions with us, but we will also collect data through automated technologies and third parties or other publicly available sources.

- **Your interactions with us.** You may give us Contact, Financial and Profile Data by interacting directly with us through our website or provision of services, including when you sign up or register for services. It also might

include any information you give us when you request marketing information is sent to you or where you give us feedback or otherwise contact us.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites we operate which use our cookies. Details of the cookies we use can be found in our cookie policy.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, like providers of technical and payment services that we engage. Additionally, Technical Data may be received from third party analytics providers or advertising networks (see our cookie policy for further details).

How we use your personal data

We will only use your personal data when we are allowed to do so under data protection law (including rules in the UK, Europe and the United States). We will not collect and use your personal data without letting you know. Our use of your data will be based on one of the following circumstances:

- Where you have provided explicit consent.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

We will not process personal data in a way that is incompatible with the purposes for which it has been collected or subsequently authorised by you. We also will not collect any personal data that is not needed for the mentioned purposes. For any new purpose of processing we will ask your approval before we begin that processing.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rule, where it is required or otherwise permitted by law.

We will not sell or rent your personal data and will get your consent before giving your personal data to any third party for direct marketing communications.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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To add you to our waiting list for details of our products and services in your location	(a) Contact	(a) Consent (b) Necessary for our legitimate interests (to understand the interest in our products and services within a particular country and to enable us to develop our relationships and grow our business in a targeted manner in specific locations)
To register you as a new customer	(a) Contact	Performance of a contract with you
To perform anti-money laundering and KYC checks	(a) Contact (b) Financial	To comply with our legal obligations
To send you numerical codes as part of a two-factor authentication when you purchase a product or service.	(a) Contact	Consent, having obtained your prior consent to receiving two-factor authentication.
To manage our relationship with you	(a) Contact (b) Profile (c) Technical (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services and to enable us to develop our relationships and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Contact (b) Technical (c) Profile	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Performance of a contract with you (c) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Contact (b) Profile (c) Technical (d) Marketing and Communications (e) Usage	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated

		and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data and send you relevant marketing communications.	(a) Contact (b) Technical (c) Profile (d) Marketing and Communications (e) Usage	(a) Necessary for our legitimate interests (to develop our products/services and grow our business) (b) Consent, having obtained your prior consent to receiving direct marketing communications.

Marketing

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving the marketing. We will process your Contact and Technical Data to form a view on what we think you may want or need or what may be of interest to you.

Third-party marketing

We will not share your personal data, including Contact Data such as telephone numbers, with any third party for marketing purposes, unless we get your express opt-in consent to do so. We may provide you with details of any offers or discounts that we have negotiated with third parties but this will be optional for you to use, and we will not share any personal data with third parties for this purpose. We will not sell your personal data with third parties for marketing purposes.

Opting out

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us using the details at the start of this notice. With regards to two-factor authentication communications, you can opt-out by logging into the website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

You can ask third parties to stop sending you marketing messages at any time by contacting them at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Please see our cookie policy for details on what cookies we use.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

Third party	Detail
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Service providers:	Where we appoint third parties to provide services on our behalf and as our processors, such service providers to provide financial transaction and payment services, web hosting and support services, marketing support services, and text marketing services.
Professional advisers:	including lawyers, bankers, auditors and insurers who provide banking, legal, insurance and accounting services.
Authorities:	regulatory, government and industry bodies, like the ICO (or other supervisory authority in relation to data protection and privacy matters), HM Revenue & Customs (or other relevant tax authority), fraud prevention organisation or law enforcement bodies who require reporting of processing activities in certain circumstances, especially in the prevention of money laundering and fraud.
Corporate partners:	includes third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
Introducers:	Personal data provided will be processed by us within our platform. Where you have been invited by a third party, such as a financial advisor or accountant, to register an account on our platform, we may share personal data relating to your use of our website, in particular Contact Data, Profile Data and Usage Data, with them.

We require all third parties with whom we share your personal data to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your

personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Since we provide an online service and our Services are available in various countries, we may (a) need to transfer your personal data outside the United Kingdom or European Economic Area (EEA) to enable us to provide our services or (b) receive your data from outside the United Kingdom or EEA.

Whenever we transfer your personal data internationally out of the UK, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the ICO or other appropriate regulatory body; or
- We may use specific contracts approved for use in international transfers which give personal data appropriate levels of protection (like the International Data Transfer Agreement approved by the ICO for international transfers out of the UK); or
- We may rely on another ground or exemption to allow us to transfer the personal data internationally. For example, where you are based out with the United Kingdom and have engaged us for services, we will rely on your consent to transfer data from our UK entity to you in another country.

We host all personal data within the EEA based on the decision of the ICO that Europe has adequate level of protection for personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data internationally.

Data security

We know that it is incredibly important to protect and manage personal data appropriately, but 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 your data transmitted online or through our website.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Where we have anonymised your personal data (so that it can no longer be associated with you) for research or statistical purposes, we may use this information indefinitely without further notice to you.

Your legal rights

The legal rights you have will depend on the country in which you access our dashboard and receive the services. The rights detailed below apply in relation to the UK. Where you are based out with the UK, you may have different or additional rights in respect of your personal data. If this is the case, please contact us and we will confirm any additional rights which may apply.

UK and European Rights

Under UK and European GDPR, you have a number of rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below, please contact us.

- Your right to be informed: You have the right to understand how we collect and use your data. This privacy notice is our main way of giving you this information but you can also contact us for further information if required.
- Your right of access: You have the right to ask us for copies of your personal information.
- Your right of rectification: You have the right to ask us to rectify information you think is inaccurate.
- Your right to erasure: You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing: You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing: You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests. You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see “Opting-Out” above for details of how to object to receiving direct marketing communications).
- Your right to data portability: This only applies to data you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated

You can read more about all of these rights at <https://ico.org.uk/global/privacy-notice/your-data-protection-rights/>.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other 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 speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

US Data Subjects

In addition to the above provisions, the following sections may apply to you if you submit data to us while in the United States.

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

Many states, including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- confirm whether we process their personal information;
- access and delete certain personal information;
- correct inaccuracies in their personal information, taking into account the information's nature and processing purpose (excluding Iowa and Utah);
- data portability;
- opt-out of personal data processing for targeted advertising (excluding Iowa); sales; or profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah); and
- either limit (opt-out of) or require consent to process sensitive personal data or process personal data of minors under 18, 17, or 16 years old.

The exact scope of these rights may vary by state. To exercise any of these rights, please submit an email explaining your grounds for appeal to info@auvault.com, where we will internally escalate the matter. You may contact the attorney general of each state by visiting their respective websites.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out right may submit a request to this designated address: info@auvault.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.