

Privacy and cookies policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and clients.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to MGIM Holdings Limited. For more information about us, see Section 16.

2. The personal data that we collect

- 2.1 In this Section 2 we have set out the general categories of personal data that we process.
- 2.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number or postal address. The source of the contact data is you and/or your employer.
- 2.3 We may process your website user account data ("**account data**"). The account data may include your account identifier, name, email address, business name, account creation and modification dates, website settings and marketing preferences. The primary source of the account data is you and/or your employer, although some elements of the account data may be generated by our website.
- 2.4 We may process your personal data that is provided in the course of the use of our services and generated by our services in the course of such use ("**service data**").
- 2.5 We may process information relating to transactions, including purchases of foreign currencies and/or services, that you enter into with us through our website and/or any third parties ("**transaction data**"). The transaction data may include your name, your contact details, your beneficiary details (or other payment details) and the transaction details.
- 2.6 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 2.7 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

3. Purposes of processing and legal bases

- 3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to regulatory bodies or professional advisers insofar as reasonably necessary for the purposes of adhering to legal obligations, managing risks and/or obtaining professional advice.
- 4.3 Your personal data held in our website database will be stored on the servers of our hosting services providers.
- 4.4 Financial transactions relating to our website and services may be handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- 4.5 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data as follows:
- (a) contact data will be retained for a minimum period of five years following the date of the most recent contact between you and us, and for a maximum period of ten years following that date;
 - (b) account data will be retained for a minimum period of five years following the date of closure of the relevant account, and for a maximum period of ten years following that date;
 - (c) profile data will be retained for a minimum period of five years following the date of deletion of the profile by you, and for a maximum period of ten years following that date;

- (d) client relationship data will be retained for a minimum period of five years following the date of termination of the relevant client relationship and for a maximum period of ten years following that date; and
 - (e) transaction data will be retained for a minimum period of five years following the date of the transaction, and for a maximum period of 10 years following that date.
- 5.4 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Security of personal data

- 6.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 6.2 We will store your personal data on secure servers, personal computers and in cloud-based software.
- 6.3 The following personal data will be stored by us in encrypted form: your name and contact information.
- 6.4 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 6.5 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

7. Your rights

- 7.1 In this Section 7, we have listed the rights that you have under data protection law.
- 7.2 Your principal rights under data protection law are:
- (a) **the right to access** - you can ask for copies of your personal data;
 - (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
 - (c) **the right to erasure** - you can ask us to erase your personal data;
 - (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
 - (e) **the right to object to processing** - you can object to the processing of your personal data;
 - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;

- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8. Third party websites

8.1 Our website includes hyperlinks to, and details of, third party websites.

8.2 In general we have no control over, and are not responsible for, the privacy policies and practices of third parties.

9. Personal data of children

9.1 Our website and services are targeted at persons over the age of 21.

9.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

10. Updating information

10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

11. About cookies

11.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

11.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

11.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

12. Cookies that we use

12.1 We use cookies for the following purposes:

- (a) **authentication and status** - we use cookies to identify you when you visit our website and as you navigate our website, and to help us determine if you are logged into our website;
- (b) **personalisation** - we use cookies to store information about your preferences and to personalise our website for you;
- (c) **security** - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (d) **analysis** - we use cookies to help us to analyse the use and performance of our website and services; and
- (e) **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally.

13. Cookies used by our service providers

- 13.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 13.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.
- 13.3 We use a Facebook pixel on our website. Using the pixel, Facebook collects information about the users and use of our website. The information is used to personalise Facebook advertisements and to analyse the use of our website. To find out more about the Facebook pixel and about Facebook's use of personal data generally, see the Facebook cookie policy at <https://www.facebook.com/policies/cookies/> and the Facebook privacy policy at <https://www.facebook.com/about/privacy>. The Facebook cookie policy includes information about controlling Facebook's use of cookies to show you advertisements. If you are a registered Facebook user, you can adjust how advertisements are targeted by following the instructions at <https://www.facebook.com/help/568137493302217>.

14. Managing cookies

- 14.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
 - (a) <https://support.google.com/chrome/answer/95647> (Chrome);
 - (b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
 - (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);

- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
- (f) <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

14.2 Blocking all cookies will have a negative impact upon the usability of many websites.

15. Amendments

- 15.1 We may update this policy from time to time by publishing a new version on our website.
- 15.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 15.3 We may notify you of significant changes to this policy by email.

16. Our details

- 16.1 This website is owned and operated by MGIM Holdings Limited.
- 16.2 We are registered in England and Wales under registration number 12256170, and our registered office is at Kemp House, 152 - 160 City Road, London, United Kingdom, EC1V 2NX.
- 16.3 You can contact us:
 - (a) by post, to Kemp House, 152 - 160 City Road, London, United Kingdom, EC1V 2NX;
 - (b) using our website contact form;
 - (c) by telephone, on +44 (0)20 8124 1542; or
 - (d) by email, using info@mgpsolutions.com.

17. Data protection registration

- 17.1 We are registered as a data controller with the Information Commissioner's Office (ICO).
- 17.2 Our data protection registration number is ZA771283.

18. Data protection officer

- 18.1 Our data protection officer's contact details are: Mike Partridge, MGIM Holdings Limited, Kemp House, 152 - 160 City Road, London EC1V 2NX or email info@mgpsolutions.com.