



GEMBA FINANCE PRIVACY POLICY

PRIVACY POLICY

Taking care of your privacy and personal data protection we have developed this Privacy Policy. Our Privacy Policy is set out below and explains how we will process your personal information and data. Nothing in this Privacy Policy shall limit your statutory rights in relation to your personal data.

By providing personal data to us, you consent to our processing of your data in accordance with this policy and other agreements. If you do not agree to the terms set out in this Privacy Policy, please do not continue to use our webpage, Web & mobile application software or services.

1. WHO WILL HOLD YOUR INFORMATION

Your Personal Data controller is GEMBA FINANCE LTD, registered in United Kingdom of Great Britain under registration number 11040011, legal address Level 39, One Canada Square, Canary Wharf, London, England, E14 5AB, who is the provider of payment services under the business name Gemba („Gemba“, „we“, „us“ or „our“).

2. WHAT INFORMATION WE COLLECT

2.1 We may receive personal information and contact details from you, such as name, date of birth, place of birth, address, telephone number, email address, information regarding your employment, financial status, bank account details and some other information when you:

2.1.1 open an account with us;

2.1.2 use the services made available on our Web & mobile application software;

2.1.3 complete any surveys we ask you to complete for research purposes (although you will never be obliged to respond to them);

2.1.4 enter any competitions or participate in any promotions sponsored by us;

2.1.5 respond to our direct marketing activities;

2.1.6 correspond with us by Web & mobile application software, post, email or via the send message forms on our webpage; or



- 2.2 If you are a corporate entity, we may also collect your registered name, registered office address, memorandum of association, articles of association, list of current shareholders, list of current directors, annual return, identification and proof of address of beneficial owners, directors and any power of attorney.
- 2.3 We may collect information about you contained in any documents you provide to us for the purposes of verifying and processing your application for an account with us.
- 2.4 We may collect information about your transactions and your activities when you apply for an account with us and carry out a transaction using our services. Such information may include without limitation the identity of the other party to the transaction, their location and the currency and amount of the payment.
- 2.5 We may receive information about you from third parties, including but not limited to credit reference agencies and other providers of public information.
- 2.6 When you visit our webpage, we collect information about your computer and browsing actions by the use of cookies.
- 2.7 If you contact us by telephone or in writing, we may keep a record of the content of that correspondence or phone call.
- 2.8 With regard to each of your visits to our webpage, we may automatically collect the following:
- 2.8.1 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;
 - 2.8.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our webpage (including date and time);
 - 2.8.3 products you viewed or searched for;
 - 2.8.4 page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

2.9 Our services are not intended for use by those under the age of 18 and we do not knowingly collect personal information from those who are under the age of 18. If you are under the age of 18, please do not apply for an account with us, provide any personal information to our webpage or use our webpage in any other way.

3. WHAT WE DO WITH YOUR INFORMATION

3.1 We use information held about you to:

3.1.1 administer and process your application for the services with us;

3.1.2 administer and maintain our customer accounts and records;

3.1.3 provide our services to you and ensure secure transaction processing;

3.1.4 improve our webpage to ensure that our service continues to be the most appropriate service for your needs and that content from our webpage is presented in the most effective manner for you and your computer;

3.1.5 help us in our efforts to keep our webpage safe and secure;

3.1.6 verify your identity and to respond to any query that you may raise with us;

3.1.7 fulfill any contractual obligations we have with you;

3.1.8 send registered users of our webpage email communications from time to time regarding updates and changes to our services and any technical, operational, administrative and legal notices important to our webpage which we consider essential.

3.2 We are obligated on selected measures against legitimization of proceeds of crime and financing of terrorism to keep records about you and your transactions.

3.3 We may use your data to contact you for market research purposes and to provide you with information about our services, offers and promotions which may be of interest to you. If we do so, we will contact you by email. If you do not want us to use your data in this way, please contact us using the contact details below.

3.4 Your information may be used by us for the purpose of research and statistical analysis and internal customer service monitoring.



- 3.5 We use certain processors in the general running of its business and to assist us in providing services to our clients, for dealing with various matters in connection with our webpage, Web & mobile application software and the services provided on our webpage, Web & mobile application software. A processor is a third party service provider or data processor engaged by us, who has or potentially will have access to or process personal data. If you would like to know a list of our processors who have or have had access to your personal data, please contact us using the contact details below
- 3.6 The period of use of the personal data supplied by you will not be longer than we deem necessary.
- 3.7 The data protection legislation gives the customers the right to access the personal data that we have about them.
- 3.8 Unless there is a particular reason, we approve customer requests regarding disclosure of their information to third parties after checking that the applicant is the person concerned. Additionally, in case of inaccurate information that we know about, we will apply the necessary changes to it.
- 3.9 If you as a customer requires information or require information to be disclosed to a third party, we are entitled to charge you a minor fee for any administrative work and costs involved in producing this information.

4. WHO DO WE MAY DISCLOSE YOUR PERSONAL DATA

- 4.1 We may disclose information about you to any of our employees, officers, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this Privacy Policy.
- 4.2 We may disclose your personal data to our branches, provided they are aware of and have undertaken to follow our Privacy Policy.
- 4.3 We may disclose your personal data to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or if we reasonably believe that disclosure of your personal data to third parties is necessary in order to enforce an agreements; or to protect our rights, property, or safety or that of our users, or others. This includes exchanging information

with other companies and organizations for the purposes of fraud protection. Such third parties may be other financial institutions, third parties involved in the execution of transactions; supervisory authorities based on written requests or the duties stipulated by the legal enactments; in the specific cases, for instance, court, investigation bodies, the prosecutor's office, operational entities, sworn bailiffs, notaries, insolvency administrators; participants of the international payment systems.

- 4.4 We are required by statute to make a disclosure where we know or suspect that a transaction involves money laundering or terrorist financing. Where we are required to make a disclosure in relation to one of your transactions, we will not be able to inform you about the disclosure or our reasons for making it.
- 4.5 We may disclose your personal data in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets and their advisers. If our business is sold your details will be passed onto the new owners of the business.

5. KEEPING INFORMATION UP TO DATE AND SECURE

- 5.1 If any of the information that you have provided to us changes, for example, if you change your email address or other contact details, or if you wish to close your account with us, please update your account details on our webpage or, alternatively, contact us using the contact details below.
- 5.2 Where we have given you (or where you have chosen) a username and password which enable you to access certain parts of our webpage, you are responsible for keeping your username and password confidential. We ask you not to share this information with anyone.

6. COOKIES

Our webpage uses cookies to distinguish you from other users of our webpage. This helps us to provide you with a more personalized experience when you browse our webpage and also allows us to improve our webpage. You can find Our Cookie policy on our webpage.



7. YOUR RIGHTS

7.1 You have certain rights under the data protection regulation in relation to the information that we hold about you. These rights include the rights set out below:

7.1.1 You are entitled to have access to your personal data. You may request by writing to us (at the address given below), details of your information which we hold and the purposes for which it is held. We will provide this information within 40 days of your request, subject to any routine processing continuing between that time and the time of response. You may be charged a reasonable fee for this information.

7.1.2 You are entitled to request that we stop using information about you for the purpose of direct marketing (i.e. the communication to you (by whatever means) of any advertising or marketing material);

7.1.3 You are entitled to require us to ensure that no decision taken by or on behalf of us and which significantly affects you is based solely on the automated processing of your information, for the purpose of evaluating such matters as, for example, your creditworthiness, reliability or conduct; and

7.1.4 You are entitled to require a correction of errors in the personal information held about you. If we disagree that information is inaccurate you are entitled to apply to ask the court for an order that such erroneous information is rectified, blocked, destroyed, or erased.

8. THIRD-PARTY WEBSITES

Our webpage may, from time to time, contain links to and from the webpages of our partner networks, advertisers, and affiliates. If you follow a link to any of these webpages, please note that these webpages 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 webpages.

9. YOUR CONSENT AND CHANGES TO THIS PRIVACY POLICY

By submitting your information, you consent to the use of that information as set out in this policy. To ensure that the most recent information about the processing of your personal data is always available to you, we will make sure that this Privacy Policy is reviewed and updated on a regular basis. Therefore, we encourage you to read, from time to time, the latest version of the Privacy Policy on our webpage.

10. CONTACT DETAILS

If you would like to contact us with any queries or comments regarding our Privacy Policy, please contact us using the contact details below:

GEMBA FINANCE LTD

Address: Level 39, One Canada Square, Canary Wharf, London, England, E14 5AB

Email: dataprotection@ge.mba

