

ARGENTEX LLP

# Privacy Policy

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## Contents

1	Introduction .....	2
1.1	Purpose .....	2
1.2	Regulatory Setting.....	2
1.3	Principles.....	2
2	Your information.....	2
2.1	Information that we collect and hold .....	2
2.2	How We Use Your Information .....	3
2.3	Data retention.....	4
3	Your Rights Under the GDPR.....	5
	Argentex is the Controller of your personal information. ....	5
3.1	Contact us: .....	5
4	Information From Third Parties .....	5
5	Sending personal data outside the UK and the EEA .....	6
6	Marketing.....	7
7	Cookies.....	7
8	Do-Not-Track.....	7
9	Recipients - Information Sharing .....	7
10	Service Providers Processing Data on Our Behalf.....	8
11	Government & Law Enforcement .....	8
12	Security .....	8
13	Criminal Data.....	9
14	Children’s Privacy.....	9
15	Notification of Changes.....	9
16	Contact Details .....	9

## 1 Introduction

### 1.1 Purpose

Argentex takes your privacy and the protection of your data seriously and this Privacy Policy explains how we use the personal information of our customers. This policy may change from time to time, we shall take reasonable steps to inform you in such a case by publication on our website.

### 1.2 Regulatory Setting

The basis for this Policy is the United Kingdom Data Protection Act 2018 (“DPA”) and United Kingdom General Data Protection Regulation (“UK GDPR”) together with The Privacy and Electronic Communications Regulations (“PECR”) and any guidance that may be provided by the Information Commissioner's Office (“ICO”).

### 1.3 Principles

As a Data Controller and custodians of your information, our privacy management practices align to the following principles:

- **Accountability:** We are responsible for the protection of personal information entrusted to us.
- **Transparency and Control:** We inform customers when we collect their personal information and we acknowledge their preferences for contact.
- **Privacy by Design:** We apply privacy requirements when designing our products, services and when implementing new technologies.
- **Security:** We implement technical, organisational, and physical security measures to ensure an appropriate level of security of the personal information we control and process.
- **Third Parties processing information:** Argentex requires its vendors, suppliers and partners to commit to privacy and data protection standards and regulations in all its jurisdictions.
- **Integrity and specific purpose:** We collect personal information to provide our services based on the contract you are entering with us. Your information will also be used to meet our legal obligations under appropriate legislation. We collect what we need to provide you with the best service, keeping it safe and accurate, while retaining it as needed for its intended purpose.

## 2 Your information

### 2.1 Information that we collect and hold

When you interact with Argentex such as through telephone, email or by visiting our website or bespoke client portal, we will collect information on you. For instance, to request information, request online product demonstrations, register for a service and enrol in customer support, we collect and ask you to provide information about yourself, essentially ‘your information’. That includes:

Type of information	Details / examples
<b>Company Data</b>	Including but not limited to your company name, business address, individual shareholders details, business e-mail address, phone number, the company you work for, your job title or business role, your area of responsibility, your country or region, your company financial details.
<b>Personal Data</b>	Including but not limited to your name, personal address, personal e-mail, phone number, your gender, your nationality, your age, your financial details such as bank account details, your tax status information and your fiscal residence, your education and qualifications.
<b>Account History</b>	Including a history of transactions made under your account.
<b>Contact History</b>	A history of when you contacted us, the method used and what was discussed.
<b>Call history</b>	A recording and transcript of any calls made to us for quality assurance, complaints handling and in order to comply with our regulatory obligations.
<b>User ID and password</b>	If you establish an account with us and request access to our client portal.
<b>Information about your computer or device</b>	Including browser type and settings.
<b>Log data</b>	Including information such as your computer's IP address, the webpage you were visiting before you came to our website, pages you visit on our website, time spent on those pages, information you search for on our website, access times and dates, and other statistics.
<b>History of interaction with our webpages</b>	Traffic data relating to your Internet connection.
<b>Other information that does not specifically identify you</b>	For example, actions taken on our website.
<b>Beneficiary account details</b>	This may include third party information you provide to us to process your transaction.
<b>Criminal record checks</b>	As part of our on-boarding process as you become a client in order to meet our regulatory obligations.
<b>Special Category Data</b>	We may process your special category personal data if we have your explicit consent; or the processing is necessary for reasons of substantial public interest, on the basis of UK law or Union or Member State law, for example to comply with KYC and anti-money laundering regulations.

Providing your information or data is optional, but it may be necessary for certain services we provide, and other such processing activities e.g. to access content, or to qualify your suitability as a new customer. In such cases, if you do not provide your information, we may not be able to provide you with the requested services.

We digitally record all telephone conversations.

## 2.2 How We Use Your Information

We use your information mainly to interact with you; to provide you with support services, to make it easy to navigate our website, to improve our website and our products, and to offer you content and services that might interest you.

We use your information as follows, where the processing is necessary to establish or administer our agreement with you:

- With your request, create a single sign on for access to your Argentex online account;
- In the performance of the contracted service we provide to you in order to make payment transfers on your behalf;
- Verify your identity and entitlement to products or services, when you contact us or access our services;
- Communicate with you regarding support services and provide you with critical service updates;
- Provide you with technical and customer support, and enable the provisioning of services;
- Where applicable, to determine your qualifications and suitability as a client, and make decisions to provide services to you; and
- Determine the entity you are connecting from.

We use your information as follows, where the processing is based on our legitimate business interests to communicate with you and improve users' experience, improve our products and services, protect our security, and defend our legal rights to:

- Call you or e-mail you with updates in this statement;
- Research and implement product improvements and product updates;
- Evaluate and improve the quality of our products, services, and website;
- Provide you with a customised experience when you visit our website;
- Secure our systems and applications;
- Enforce our legal rights and comply with regulatory requirements; and
- Monitor, administer, and analyse use of the website; increase our website's functionality and user-friendliness.

We may also use your information where processing is necessary for us to comply with legal obligations, including responding to legal process or lawful requests.

### **Change of Purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

In certain circumstances, where required or permitted by law, we may have to process your personal data without your knowledge.

### **2.3 Data retention**

*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.

## OR

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for regulatory purposes.

In some circumstances you can ask us to delete your data- see your legal rights.

## 3 Your Rights Under the GDPR

### Argentex is the Controller of your personal information.

- You have the right to request access to your information that we hold about you.
- You have the right to request us to rectify it if you believe any of your Personal Data is incorrect or incomplete, we will, upon your request, take steps to check it and correct any factual inaccuracies.
- You have the right to request your data to be deleted, removed or erased (the “right to be forgotten”) subject to any legal or regulatory obligations Argentex may have to retain it.
- You have the right to restrict processing. Under certain circumstances, you may ask us to restrict the processing of your Personal Data.
- You have the right to data portability if we hold your Personal Data electronically, you can ask us to transfer the data to another organisation in a safe and secure way and in a machine-readable format.
- You have the right not to be subject to automated individual decision-making, including profiling.

### 3.1 Contact us:

You can exercise your rights by sending an email to [DPO@argentex.com](mailto:DPO@argentex.com). You can write to the same address if you have questions or concerns about this Privacy Policy or our privacy and security practices.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## 4 Information From Third Parties

Third parties may provide us with information about you from online and offline sources. We may combine such information with the information we already have about you, to provide you with a better experience, to determine your interest in our products, and to improve the quality of our offerings. For instance, we may use third party web analytics tools to pool together contact

information collected through any of our forms or email campaign with contact information provided by you via opt-in on other website form or email – to identify you when you visit our website.

We may also aggregate your information with information collected from other website visitors, to generate statistics, and analyse and understand how visitors use our site.

Also, we will be using information from third parties to confirm suitability as a client and to meet our legal obligations.

Examples of third parties we may obtain information on you from or share your Personal Data with:

- third party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of your Personal Data for the purposes described in this Privacy Policy. This may include, but is not limited to, IT service providers such as cloud providers of software as a service, data room providers and providers of our IT servers and communications service providers; and our professional advisors (legal, auditing or other special services provided by lawyers, notaries, trustees, company auditors or other professional advisors);
- third parties relevant to the services that we provide. This may include, but is not limited to, counterparties to transactions, other professional service providers, financial institutions, regulators, authorities, governmental institutions and stock exchanges; and/or
- to the extent required by law, regulation or court order, for example, if we are under a duty to disclose your Personal Data in order to comply with any legal obligation.

## **5 Sending personal data outside the UK and the EEA**

We may need to transfer your Personal Data to a country outside the UK or outside the European Economic Area (the “EEA”), such country being referred to as a “third country”.

Where this is the case, we will make sure that your Personal Data is protected to the same extent as in the UK and the EEA by implementing one of the following measures:

- 1) we will transfer Personal Data to a third country with privacy laws that give the same level of data protection as in the UK and EEA, as evidenced by
  - i. “adequacy regulations” made by the Secretary of State (in case of a transfer outside the UK) or
  - ii. an “adequacy decision” adopted by the European Commission (in case of a transfer outside the EEA);
- 2) in the absence of adequacy regulations or of an adequacy decision (as applicable), we will put in place appropriate safeguards such as
  - i. standard contracts for international transfers of Personal Data approved for use by the UK Information Commissioner’s Office (in case of a transfer outside the UK) or

- ii. standard contractual clauses approved for use by the European Commission (in case of a transfer outside the EEA).

## 6 Marketing

We may from time to time choose to extend an invite to sporting events or may send you a small token of our thanks. We may also use your information to contact you with marketing, promotional materials, and other information that may be of interest to you. This may include using demographic data or trend data provided by third parties, where permitted. Contact details, including phone numbers and email addresses, may be used to contact you.

At any time, if you no longer wish to receive communications from us, please submit your request by contacting [DPO@argentex.com](mailto:DPO@argentex.com)

## 7 Cookies

We use cookies, including third party cookies, for different purposes, including presenting you with information based on your browsing preferences, such as language and geographical region; collecting statistics regarding your website usage; allowing automated login; providing us with business and market information; and, in some cases, enabling us to provide you with interest-based advertisements on websites other than our own. However, we do not track your activities on other sites. If you click on our advertisements, we will know only the domain you came from.

Cookies are small text files that are placed on your computer or device by a website that you visit or HTML-formatted emails you open. You can choose to reject or turn off cookies through your browser settings and you can manage your preferences through our cookie consent manager. If you do not accept cookies, you may not be able to use all the functionalities of the site. You will not be tracked by cookies if you interact with us through email or telephone.

## 8 Do-Not-Track

There are different ways you can prevent tracking of your online activity on our website. One of them is setting a preference in your browser that alerts websites you visit that you do not want them to collect certain information about you. This is referred to as a Do-Not-Track (DNT) signal. Please note that our website may not recognise or react in response to DNT signals from web browsers. At present, there is no universally accepted standard for what a company should do when a DNT signal is detected. In the event a final standard is established, we will assess how to appropriately respond to these signals.

## 9 Recipients - Information Sharing

We do not sell, lease, rent or give away your information.

We will only share your information as described below, with our service providers that process information on our behalf, and as required by law enforcement. In instances where we share your information, we require the companies to comply with appropriate privacy and confidentiality requirements, and security standard best practices.



## 10 Service Providers Processing Data on Our Behalf

We may employ third party companies and individuals to provide services associated with the website, to perform website-related services (e.g., without limitation, site feature improvement, maintenance services, database management and web analytics), to analyse use of our website or to conduct marketing activities on our behalf (e.g., email management firms and internet advertising platforms, etc.), to perform collection services, to deliver requested goods and services to you. We do not allow service providers to share your information with others without our authorisation, or to use it for their own purposes.

We may share your personal data with:

- our service providers or third parties which process information on our behalf to fulfil our contracted services to you.
- third parties where you have a relationship with that third-party, and you have consented to us sending information (for example social media sites or other third-party application providers).

We may also share non-personal information (such as aggregated usage data and demographics, referring pages, platform types, click counts, etc.) with third parties to help us understand usage patterns for our services, etc.

## 11 Government & Law Enforcement

We may only disclose personal information to any law enforcement agency or government body in response to:

- A warrant or other process issued by a court of competent jurisdiction;
- A legal process having the same consequence as a court-issued request for information, in that by refusing to provide such information, we would be in breach of local law, and we or our, executives or employees would be subject to liability for failing to honour such legal process;
- Where such disclosure is necessary for us to enforce our legal rights pursuant to the laws of the jurisdiction from which such information was gathered; or
- Where such disclosure is necessary to prevent or lessen a high risk to the rights and freedoms of data subjects.

## 12 Security

The security of your information is important to us. We use appropriate technical and organisational security measures to protect your information from misuse, unauthorised or unlawful access or disclosure, loss, alteration, damage or destruction. These measures include:

**Physical safeguards**, with locked doors and file cabinets, controlled access to our facilities and secure destruction of media containing your information.

**Technology safeguards**, such as the use of anti-malware, encryption, monitoring of our systems and data centres, firewalls, encrypted channels, and secure communications software, to safeguard the confidentiality of your information.

**Organisational safeguards**, training and awareness programs on security and privacy, to make sure employees understand the importance and means by which they must protect personal information. Our organisation privacy policies and standards also guide our handling of your information.

## 13 Criminal Data

Where permitted by law we may process information about criminal convictions, offences and alleged offences for specific and limited activities and purposes. This is necessary in order to fulfil our legal obligations.

## 14 Children's Privacy

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products and services are not directed or aimed at children under 18 and we do not knowingly collect personal information from them.

## 15 Notification of Changes

This Privacy Policy may be changed or updated from time to time. We will inform you if there are any material changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 16 Contact Details

You can contact us in relation to this Privacy Policy by emailing our data protection office at [DPO@argentex.com](mailto:DPO@argentex.com).



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[www.argentex.com](http://www.argentex.com)