

Privacy & Cookie Policy	2
Information we may collect from you	2
What personal data do we collect about you?	3
What legal basis do we have for using your personal data?	4
Disclosure of your information	6
Sharing your data with third parties for their own purposes	7
Where we store your personal data	7
How long will we keep your personal data?	8
Your rights	8
Marketing	10
How to Complain	10
Third Party Websites	10
Cookies	11
Consent to use cookies	12
Changes to our privacy policy	12
Contact	13

Privacy & Cookie Policy

Smartlands Platform Ltd (“we”, “us”, “our”) may collect, store and use information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (the General Data Protection Regulation or the "GDPR") and any other relevant legislation and regulations.

For the purposes of the GDPR, we are the data controller of any personal data we process about you. This policy sets out details of how we process data in relation to you. By “personal data”, we mean all information that relates to, identifies or may identify you.

This policy (together with our terms of use www.smartlands.io/terms-and-conditions.pdf and any other documents referred to on www.smartlands.io (“our site”) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Information we may collect from you

You acknowledge that we may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, carry out transactions or make payments through our site, report a problem with our site or carry out any other activities on our site. We may also gather data about you:

- When you engage with us on social media.
- When you enter our prize draws or competitions.
- When you book any kind of appointment with us or book to attend an event.
- When you choose to complete any surveys we send you.
- When you comment on or review our products and services.

- Third parties. We may receive information about you from third parties our business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies or other third parties where you've given a third party permission to share with us the information they hold about you.
- **Publicly-available sources.** We may collect information about you from publically available sources such as Land Registry, credit referencing agencies and vote registers.

What personal data do we collect about you?

We will collect certain personal data about you in the course of your relationship with us. This information includes:

- your name, address, e-mail address and phone number, financial and credit card information.
- copies of documents you provide to prove your age or identity where the law requires this. (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- notes from our conversations with you, details of any complaints or comments you make, details of investments you made and how and when you contact us.
- with regard to each of your visits to our site we may automatically collect the following information:
 - technical information, including the internet protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full uniform resource locators (URL) clickstream 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-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

What legal basis do we have for using your personal data?

When we use your personal data we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal data we process and why. The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal data for a specific purpose.
- **contract:** where our use of your personal data is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- **legal or regulatory obligation:** where our use of your personal data is necessary for us to comply with the law or our regulatory obligations.
- **legitimate interests:** where our use of your personal data is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal data which overrides our legitimate interests).
- For further details on when we collect personal data, what we collect as well as how we use it, please read the following sections: to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.
 - to notify you about changes to our service;
 - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them;

- to fill contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience;
- to protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest. For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations; and
- to process payments and to prevent fraudulent transactions.

Disclosure of your information

We may share your personal data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. We provide only the information they need to perform their specific services. They may only use your data for the exact purposes we specify in our contract with them. We work closely with them to ensure that your privacy is respected and protected at all times. If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

We may share your information with selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- 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 optimisation of our site;

- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal data to third parties:

- 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;
- if we or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements between you and us, or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Sharing your data with third parties for their own purposes

We will only do this in very specific circumstances, for example:

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

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”). It may also be processed by staff outside the EEA working for

us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your investment, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

We have put in place safeguards to protect personal data processed in or accessed from any destination outside of the EEA. You can obtain a copy of the safeguards in place for such transfers by contacting us using the contact details set out below in the “Contact” section below.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long will we keep your personal data?

Whenever we collect or process your personal data, we’ll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Different retention periods apply for different types of personal information. Further details on this are available on request using the contact details set out below in the “Contact” section below.

Your rights

You have the following rights under the GDPR, in relation to your data that we process:

- **Right of access:** you have the right to obtain a copy of your personal information as well as other supplementary information.
- **Right to rectification:** you have the right to have inaccurate or incomplete personal information rectified.
- **Right to be forgotten:** you have the right to request that your personal information be erased.
- **Right to restrict processing:** you have the right to restrict our continued processing of your personal information, in certain circumstances.
- **Right to object to processing:** you have the right to object to your personal information being processed for direct marketing at any time or to our continued processing of your personal information, in certain circumstances.
- **Right to portability of data:** you have the right, in certain circumstances, to receive personal information in a structured, commonly used and machine readable format, and a right to request that we transmit your personal information to another data controller.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under GDPR.

If you would like to exercise any of those rights, please:

- email, call or write to us - see below: 'Contact' section below; and
- let us have enough information to identify you (e.g. your full name, address and customer or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

- let us know what right you want to exercise and the information to which your request relates.

Marketing

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at contact@smartlands.io.

How to Complain

We hope that we can resolve any query or concern you raise about our use of your information. Please feel free to contact us using the details set out in “Contact” section below.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Third Party Websites

Our site may, from time to time, contain links to and from the websites of our partner networks, 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.

Cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

We use the following cookies:

- Strictly necessary cookies – which are required for the operation of our website, including, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies – which allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies – which are used to recognise you when you return to our website, enabling us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies – which record your visit to our website, the pages you have visited and the links you have followed. We use this information to make our website more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

The table below provides more information about the **cookies** we use and why:

The cookies we use	What they do
<i>Smartlands.io</i> Cookies Functionality cookies	There are cookies set by the main page of the smartlands.io website to identify a visitor, remember settings and customize user

	experience
<i>Platform Cookies</i> Strictly necessary cookies	There is an authorization/session cookie set by the platform.smartlands.io website to authenticate a visitor of the platform
<i>Google Analytics</i> Analytical/performance cookies	This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (eg how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had.
Facebook Targeting Targeting cookies	There is a targeting cookie set by the Facebook to track what pages a user has visited to let us better customize a user experience.

Consent to use cookies

We will ask for your permission (consent) to place cookies or other similar technologies on your device, except where these are essential for us to provide you with a service that you have requested.

There is a notice on our home page which describes how we use cookies and requests your consent to place cookies on your device.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Changes to our privacy policy

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

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to contact@smartlands.io