

## **Privacy Policy**

**This policy sets out the persons from whom we collect personal data (“Data”) and how we may collect that data and use it.**

We take personal privacy and security of any information (which, for the purposes of this Notice we will refer to as ‘Personal Data’) that you provide to us very seriously.

It is this policy (together with all of our other policies and Terms of Use) as documented or referred to on our website and in hard copy if applicable which sets out the basis on which any personal data we collect from you or that you provide to us and how it 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. By visiting our website and by completing or filling any of our forms including any agreements or otherwise contracting with us you are accepting and consenting to the practices described in this policy.

### **The Formalities**

For the purposes of the EU General Data Protection Regulations and any subsequent UK legislation based on those Regulations (GDPR) the data controller is:

**Mint Securities LTD.**

and the Data Protection Officer (DPO) is:

**Kiran Gohel.**

If you have any issues about how your data is being used he may be contacted at:

**[kgohel@mintsecurities.co.uk](mailto:kgohel@mintsecurities.co.uk).**

### **The Detail**

We may collect and process the following data.

Information about you that you give us by filling in forms on our Website (including the information you provide when you register to use our website, subscribe to any of our services, search for a product, place an order on our Website including services we provide or participate in any function on our Website) or completing any forms that we have provided you with or by corresponding with us by phone, email or otherwise.

To be absolutely clear this information may include (but is not limited to) your name, address, email address and phone number, financial and credit card information passport details, personal description and photograph.

- With regard to each of your visits to our website we will automatically collect the following information.
  - Technical Information. This may include, for example, the IP address used to connect your computer to the internet, your log-in information, browser type and version, and time-zone setting.
  - Information about your visit. This may include the full URL through and from our Website including date and time.
  - Such information as is otherwise provided by you in order for us to reasonably be able to provide you with our services.
- We may also receive information about you from other sources including other websites that we operate or other services that we provide. We may share that data internally and combine it with data we have already collected. We will only share and combine your data so we can provide the services that you have requested. We work closely with some third parties (including, for example, business partners, sub-contractors, valuers, jewellers, support services, payment and delivery services advertising networks, analytics providers, search information providers and credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.
- Information received from filling in forms including information required as appropriate for our service requirements.
- It is also possible that we may collect information as a result of combining certain data we have collected or which has been inferred by analytical algorithms. Any such information will only be used if we can reasonably assume that it will comply with this policy.

## Use of the Data

- **If you provide us with information you consent to us using it as follows:**
  - 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 or which we reasonably feel would be of interest to you.
  - to provide you with permitted selected third parties to provide you with information about goods or services we reasonably feel may interest you. If you are an existing customer we will only contact you by electronic means (email or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiation 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. In order for us to use your data in this way or to pass your details on to third parties for marketing purposes please tick the relevant 'opt-in' box situated on the form from which we collect the data.

- to notify you about changes to our services.
- to ensure that content and services from our website or from our internal management systems is presented in the most effective manner for you and your computer.
- **You consent to us using information we have collected about you either directly or from other sources (but not necessarily directly from you) for:**

## **Website**

- to administer our Website and internal management systems and for internal operations including trouble-shooting, data analysis, testing, research, statistic and survey purposes.
- to improve our Website to ensure that content is presented in the most effective manner for you and your computer.
- to allow you to participate in inter-active features of our service when you choose to do so.
- as part of efforts to keep our Website safe and secure.
- to measure or understand the effectiveness of advertising.
- to make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.

## **Our business relationship with you**

- to enable us to comply with services you have requested from us.
- to ensure our employees are properly prepared and able to provide our services.
- to provide appropriate marketing material to you.

## **Information we receive from other sources**

We may add information to that you have provided and use this combined information for purposes set out above depending and to enhance those purposes.

### **These paragraphs tell you who we will share your information with**

You agree that we have the right to share your personal information with:

- Any member of our Group which means our subsidiaries, our ultimate holding company and its subsidiaries and any linked (including franchised) companies.
- To selected third parties including:
  - Business Partners, Suppliers and Sub-Contractors for the performance of any contract we enter into with you.
  - Analytics and Search Engine Providers that assist us in the improvement and optimisation of our Website.
  - Credit Reference Agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
  - Jewellers and Valuation Services when required to fulfil our contract to you.
- Any legal authorities in order to comply with anti money laundering regulations and responsibilities and other legal requirements and commitments.

### **In particular we may disclose your personal information as follows:**

- With your consent.
- In the event that we sell or buy any business or assets which require us to disclose your personal data to the prospective seller or buyer of such business or assets:
- If Mint Securities LTD or any group or linked companies or substantially all of its or their assets are acquired by the third party, in which case personal data held by Mint Securities LTD and / or its group or linked companies on its 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 our Terms of Use and any other Agreements or to protect the rights, property or safety of our customers or others.

### **How we will look after your personal information we have collected:**

- We will ensure that we keep a full record of your information.
- We will only keep your information for as long as we reasonably or legally need in order to provide you with the services you have requested or for a period of 2 years

unless you have opted for us to keep it for specific times or reasons or if we are legally or contractually required to keep it for longer.

- Your personal information will be stored on secure servers based at our offices or secure hosting locations based in the UK and will be protected by passwords and other relevant security provisions to limit those who have authorised access and to prevent unauthorised access.
- We will ensure that your personal data is held compliant with your rights set out below.

**Under GDPR you have certain rights which we set out below:**

- The right to be informed about the personal information held and to access it.
- The right to check that the personal information we hold is accurate.
- The right to have inaccuracies deleted or altered.
- The right to have the information erased or to restrict processing.
- The right to take your any away any personal data that you have provided, you have consented to us obtaining or is obtained by automatic methods.
- The right to object generally and to lodge a complaint to the Information Commissioners Office.
- The right not to be subjected to automatic decision making.

**Outside of the European Union?**

If we send your personal information outside of the EU we will always need your specific consent. Without that our policy is not to send personal information outside of the EU.