Round Financial Limited Privacy Policy

Date these terms take effect: 02/07/2026

1. Introduction

We are Round, a financial technology platform that is based in London and operates roundtreasury.com. We operate under the following company:

Round Financial Limited, a company registered in England and Wales with company number 14609702, Information Commissioners Office number 00014788205 and registered address Laundry Studios, 2 Warburton Road, London, England, E8 3RT.

Round Financial Limited (FRN: 1050315) is authorised and regulated by the Financial Conduct Authority.

Round is an agent of Plaid Financial Ltd., an authorised payment institution regulated by the Financial Conduct Authority under the Payment Services Regulations 2017 (FRN: 804718). Plaid provides you with regulated account information services through Round as its agent.

This Privacy Policy is an overview of how we collect, use, and process your personal data when you use our Website and our App.

This policy details the personal information we collect and use, how we look after it, and the circumstances in which we may share it with someone else. It also sets out your rights around how we handle your information and lets you know how to contact us if you have any concerns.

Please read this Policy carefully, as it becomes legally binding when you use our Services and access our Website. We take privacy and protection of your data very seriously and are committed to responsibly handling the personal information of those we engage with and in a way that meets the legal requirements of the countries in which we operate. By agreeing to use our Services, you agree that your personal data will be handled by Round Financial Limited. If you have any questions about how we protect or use your data, please email us at dpo@roundtreasury.com.

2. Definitions

Agreement - means Round Financial's Terms of Service and its Schedules, as amended from time to time and made available in the App and the Website.

App - means our web application through which we will provide to you the Services.

Data controller - means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data processor - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller.

Data processing - means activities which are performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

EEA - means the European Economic Area.

GDPR - means the Regulation (EU) 2016/679, referred to as “the General Data Protection Regulation”.

UK GDPR - means regulation Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419).

Round, we, us, our - means Round Financial Limited.

Services - means the services that we provide to you under the Agreement.

KYC - means “know-your-client”, a regulatory obligation to identify and verify the clients who use our services.

Personal data - means any information relating to an identified or identifiable physical person — an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the identity of that natural person.

Policy - This privacy policy, as amended from time to time and made available in the App and the Website.

Website - Means the website of Round, currently: https://roundtreasury.com

3. What data we collect about you

When you sign up to use our Services, we need to process your personal data. On a high level, we use and process the following data:

Personal details such as your full name, personal identification number (or an equivalent identifying code), date of birth, age; Contact information such as your email address, residence address and supporting documentation thereof (for example utility bills), phone number; Background information to fulfil our regulatory requirements such as bank account information (and information in the bank statements), IP address, tax residency and tax identification numbers, citizenship, employment information, source of wealth, information provided in the identification documents (date of issue, expiry date, picture, country of issuance, etc.); Data on how you use the Services various statistics and information on your Service usage, for example how many times a month you use the Services and what features do you use and how; Data to facilitate the usage of Services for example your login details, payment information (your bank account number to make the deposits and withdrawals), browser type and version, time zone settings, operating system of your device to access the Services.

To learn how specifically we process your personal data, please find a detailed overview of personal data processing in the Annex 1 below. Please be aware that we may collect the information provided in the Annex 1 but depending on specifics, we do not always collect all of those data points in respect to each individual data subject.

4. Why do we use your data

It is necessary for us to process your data in order to provide the Services to you and to fulfil our legal requirements. If you decline to share with us the data we request, we are unable to provide the Services to you. We use your personal data in order to:

carry out our obligations relating to your Agreement (Terms of Service) with us and to provide you with the information, products and Services, as well as facilitate social features connected to our Services;

comply with any applicable legal and/or regulatory requirements;

notify you about changes to our Services;

keep our Services safe and secure;

administer our Services and for internal operations;

improve our Services;

measure or understand the effectiveness of advertising we serve;

deliver relevant advertising to you;

analyse, identify and categorise customers who use or may be interested in the Services;

combine information we receive from other sources with the information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. Legal basis for using your data

To use the information as provided in section 4, we rely on following data processing grounds:

Consent ((UK) GDPR Article 6 (1)(a)). We can process your data based on your consent. We for example may send you marketing materials based on your consent;

Performance of a contract ((UK) GDPR Article 6 (1)(b)). We may process your data to perform our obligations pursuant to the Agreement to provide the Services to you. This might for example be the case if you contact customer support with any questions you might have;

Legal obligations ((UK) GDPR Article 6 (1)(c)). We may process your data if it is necessary to meet legal obligations we are subject to. This for example might be data processing we conduct during our anti-money laundering activities;

Legitimate interest ((UK) GDPR Article 6 (1)(f)). We may process your data if we have a legitimate interest to do so. Such necessity might arise for example for business development, to ensure information security, during fraud investigations, if required so by our external cooperation partners or if necessary to protect our legal interest.

6. Sharing data

We aim to share as little personal data on you as possible to service providers, especially outside the UK and EEA region. Whenever possible, we anonymize the shared data so that you cannot be identified based on that data. In addition to that, we may transfer your personal data to countries outside the UK and EEA area if it is necessary for the purposes as provided in Annex 1 of this Policy. In such cases we shall ensure that adequate safeguards are in place to protect your rights. You may request a copy of such safeguards we have put in place by contacting us via email.

We may also share your personal data if we are legally required to do so, for example in cases of financial supervisory authority, financial intelligence unit, tax authority or other relevant authority requesting personal data from us.

More specifically, we may share your data to following parties:

Public authorities – upon receiving a valid request from a public authority, we shall share personal data to comply with our legal obligations. Public authorities are deemed to function as independent controllers in such cases;

Service providers – in order to provide you with the best Service, we are cooperating with various service providers to (this list is high-level and not conclusive):

- facilitate the participation in financial markets (for example trade execution and settlement partners);
- deliver to you the relevant data (such as market data, information concerning the financial instruments, etc.);
- support and maintain our IT infrastructure (for example servers);
- meet our regulatory obligations (KYC and sanction-related monitoring for example), etc. In such situations the service providers will function as data processors.
- provide AI-assisted processing of documents and data you upload to the Platform (for example, invoice data extraction and fraud detection);

As referred in this section above, from time to time, we also may share aggregated data, such as statistical or demographic data with our service providers to better understand our customer behaviour, which allows us to improve our services and target our marketing efforts more knowingly. Before sharing such data we aggregate and anonymize it so that you nor any other customer will be identifiable within the dataset.

We use AI technologies to assist in processing certain data you provide to us, such as extracting information from uploaded documents and flagging potential anomalies. These AI-assisted processes do not result in decisions that produce legal effects or similarly significant effects on you without human review. No financial transaction is executed on the basis of AI processing alone. You are always given the opportunity to review and confirm any AI-assisted output before action is taken.

6A. AI-Assisted Processing

We use artificial intelligence and machine learning technologies to assist in providing certain features of our Services, including extracting data from documents you upload to the Platform (such as invoices), identifying potential fraud indicators, and flagging duplicate or anomalous transactions.

AI-generated outputs are presented to you for review before any action is taken. No payment or financial transaction is executed solely on the basis of AI processing without your confirmation.

We may use third-party AI service providers to deliver these features. Where we do so, your data is shared with those providers solely for the purpose of providing the relevant Service to you. We do not use your data to train general-purpose AI models.

Further detail on the personal data processed by AI, the purposes for which it is processed, and the applicable legal basis can be found in Annex 1.

7. Where we store your data

Protection of personal data is very important to us. We use various technical and organisational measures to ensure that your data is safe with us.

Your personal data is stored either in our databases or in databases of our service providers. Servers storing such data are physically located in the UK. In some instances, we may share your data with service providers located outside the UK region, please see section 6 for more details.

8. How long we keep your data

We generally store your personal data as long as necessary for the purpose under which we collected the information. As a regulated financial institution, we are required by law to store some of your personal and financial data beyond the closure of your account with us. We will delete data that is no longer required by a relevant law or jurisdiction in which we operate. Our general data retention period is 5 years after ending the business relationship with you. This is a statutory data retention period which we have to follow to be compliant with our legal obligations. In some cases we may need to hold your personal data for longer to meet our legal obligations or if we have a legitimate interest (if longer data retention is for example required by our cooperation partners) to do so.

9. Your data protection rights

Under relevant data protection laws and this Policy, you have various rights related to your personal data as provided below:

Right to access. You have the right to request access to the information we hold about you. Please be aware that this right can sometimes be limited by our regulatory obligations. We are unable to provide you access to personal data that would cause us to break the law, for example.

Right to rectification. You have the right ask us to update any of the information about you that you think is inaccurate or incorrect.

Right to erasure and restriction of processing. You have the right to ask us to delete, stop processing or limit our use of your information that we hold. To do this, please see Section 11 below. Please be aware that if we have a regulatory obligation to still retain this information, we might be unable to facilitate this request until the required retention period has elapsed.

Right to data portability. You have the right to receive your personal data, which you have provided to us, in a structured, commonly used, and machine-readable format and you have the right to request us to transmit this data to another data controller if the data was gathered by your consent, pursuant to the Agreement between us or via automated means.

Right to withdraw your consent. Your consent is voluntary, and you have the opportunity to withdraw your consent at any time. Please be aware that in such cases we may not be able to provide Services to you. In addition to that, you always have the right to withdraw your consent from receiving marketing materials from us. We provide you with the option to unsubscribe from such communications in each email, via the unsubscribe link. We still shall send you relevant information regarding the Services and our Agreement.

Right to complain. Under the Data Use and Access Act 2025, you have the right to make a complaint directly to us about how we process your personal data. If you wish to exercise this right, please contact us at dpo@roundtreasury.com. We will acknowledge your complaint within 30 days of receipt and will endeavour to resolve it as soon as reasonably practicable. If you are not satisfied with our response, you may also raise a complaint with the Information Commissioner’s Office (see Section 12 below).

10. Requesting deletion of data

You have the right to ask us to delete, stop processing or limit our use of your information that we hold. To do this, please email dpo@roundtreasury.com and detail the data you may have shared. We will respond within 30 days to your request. In some instances, we may be unable to erase data due to regulatory requirements that require us to retain records for a certain period of time. If this is the case, an explanation will be provided in the response to your request. The request may also result in restriction to Services we are able to provide to you.

11. Complaints

You have the right to complain to us about how we handle your personal data. To make a complaint, please contact us at dpo@roundtreasury.com. We will acknowledge your complaint within 30 days and will work to resolve it as soon as reasonably practicable.

If you have any other concerns about our use of your personal data, you can make a query to us at help@roundtreasury.com and we will do our best to address the issue.

If you feel that we have not addressed your questions or concerns adequately, or you believe that your data protection or privacy rights have been infringed, you can complain to:

the Information Commissioner's Office (ICO) in the UK. The ICO's contact details: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom, Helpline number: 0303 123 1113, ICO website: https://www.ico.org.uk. More information can be found at https://ico.org.uk/make-a-complaint/ You have a right to bring an action before a court.

12. Applicable law and jurisdiction

In respect to Round Financial Limited, this Policy will be governed by and construed in accordance with English law. Without prejudice to any rights you may have to refer a complaint to the authorities, the courts of England and Wales have exclusive jurisdiction to settle any dispute arising in connection with this Agreement and for such purposes we and you irrevocably submit to the jurisdiction of English courts.

13. Changes to this Policy

We continuously review our policies and procedures. We'll post any changes we make to this policy on this page and let you know about any significant changes via email. You are advised to review this Privacy Policy periodically for any changes.

Annex 1

Personal data processing details

Personal data	Purpose	Source	Legal basis
First and last name, phone number, date of birth, personal	To meet our regulatory obligations for the provision of Services; To identify the person	Directly from the data subject, some data points are verified using public databases	Legal obligations ((UK)GDPR art 6 (1)(c)); Performance of

identification number (or equivalent), age	who is party to the Agreement		a contract ((UK) GDPR art 6 (1)(b))
Contact information: email address, residence address, geographical location (IP address), supporting documentation (utility bills, bank statements, other equivalent documents)	To know how we can contact you; For regulatory purposes	Directly from the data subject	Performance of a contract ((UK) GDPR art 6 (1)(b)); Legal obligations ((UK) GDPR art 6 (1)(c))
Background information: bank account information, IP address, tax residency and tax ID number, citizenship, employment information, source of wealth, personal identification card data points	To understand to whom we shall provide the Services; To fulfil our regulatory obligations (related to KYC) as a provider of investment services	Directly from the data subject	Legitimate interest ((UK) GDPR art 6 (1)(f)); Legal obligations ((UK) GDPR art 6 (1)(c))
Data on how you use the Services: information on how long and how often you use the Services, what features you use, relevant demographic factors	To improve the platform and our Services and how we market our Services	Directly from the data subject	Legitimate interest ((UK) GDPR art 6 (1)(f))
Marketing: email address, citizenship, etc.	To provide you with marketing materials such as new feature and product releases	Directly from the data subject	Consent ((UK) GDPR art 6 (1)(a))
Financial data: your payment information (cards, bank accounts, etc.), orders, deposits, investments, etc.	To provide the Services; To improve the platform	Directly from the data subject, from service providers used by the data subject	Performance of a contract ((UK) GDPR art 6 (1)(b)); Legitimate interest ((UK) GDPR art 6 (1)(f))
Information around our Services: email address, first and last name, in-platform onboarding state	To provide the Services as well as informational and educational content about App features, financial markets, remaining actions in the onboarding flow	Directly from the data subject	Legitimate interest ((UK) GDPR art 6 (1)(f))
Contact information of a company's representative	To introduce the Services and provide information content about Round	Publicly available data	Legitimate interest ((UK) GDPR art 6 (1)(f))

Customer support: different kinds of communications (emails, other messages, phone calls, etc.), information provided in those communications	To provide the Services	Directly from the data subject	Performance of a contract ((UK) GDPR art 6 (1)(b))
Data related to information security measures (technical information on how our Website and App is accessed and used)	To provide the Services	Directly from the data subject, public databases	Legitimate interest ((UK) GDPR art 6 (1)(f))
Invoice and payment document content: supplier names, bank account details, payment amounts, dates, references, and any other information contained in documents uploaded to the Platform	To provide AI-assisted payment preparation, data extraction, and fraud and duplicate detection as part of the Services	Directly from the data subject (uploaded documents)	Performance of a contract ((UK) GDPR art 6 (1)(b)); Legitimate interest ((UK) GDPR art 6 (1)(f))