

Privacy Policy

A legal disclaimer

1 INTRODUCTION

1.1 Important information and who we are

Welcome to Count's Privacy and Data Protection Policy ("Privacy Policy").

At Count ("we", "us", or "our") we are committed to protecting and respecting your privacy and Personal Data in compliance with the United Kingdom General Data Protection Regulation ("GDPR"), the Data Protection Act 2018 and all other mandatory laws and regulations of the United Kingdom.

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights, how the law protects you, and inform our employees and staff members of all their obligations and protocols when processing data. The individuals from which we may gather and use data can include:

- Customers,
- Website visitors,
- Newsletter subscribers and
- any other people that the organisation has a relationship with or may need to contact.

This Privacy Policy applies to all our employees and staff members and all Personal Data processed at any time by us.

1.2 Your Data Controller

Count is your Data Controller and responsible for your Personal Data. We are not obliged by the GDPR to appoint a data protection officer and have not voluntarily appointed one at this time. Therefore, any inquiries about your data should either be sent to us by email to hello@count-finance.com or by post to United Kingdom.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.3 Processing data on behalf of a Controller and processors' responsibility to you

In discharging our responsibilities as a Data Controller we have employees who will deal with your data on our behalf (known as "Processors"). The responsibilities below may be assigned to an individual or may be taken to apply to the organisation as a whole. The Data Controller and our Processors have the following responsibilities:

- Ensure that all processing of Personal Data is governed by one of the legal bases laid out in the GDPR (see 2.2 below for more information);
- Ensure that Processors authorised to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk associated with the processing of Personal Data;
- Obtain the prior specific or general authorisation of the Controller before engaging another Processor;
- Assist the Controller in the fulfilment of the Controller's obligation to respond to requests for exercising the data subject's rights;
- Make available to the Controller all information necessary to demonstrate compliance with the obligations laid down in the GDPR and allow for and contribute to audits, including inspections, conducted by the Controller or another auditor mandated by the Controller;
- Maintain a record of all categories of processing activities carried out on behalf of a Controller;
- Cooperate, on request, with the supervisory authority in the performance of its tasks;
- Ensure that any person acting under the authority of the Processor who has access to Personal Data does not process Personal Data except on instructions from the Controller; and
- Notify the Controller without undue delay after becoming aware of a Personal Data Breach.

2 LEGAL BASIS FOR DATA COLLECTION

2.1 Types of data / Privacy policy scope

“Personal Data” means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Not all of the following types of data will necessarily be collected from you but this is the full scope of data that we collect and when we collect it from you:

- **Profile/Identity Data:** This is data relating to your first name, last name, gender, date of birth. Your gender is collected when you onboard and will only be taken into consideration where you have a pension product with us to meet our legal obligations. This can be photo ID, passport number, national insurance number, driving license number, tax residency, and nationality.
- **Authentication Data:** The data used to access our services. This includes your password, security questions and answers as well as your unique account and profile number used for accessing your account.
- **Contact Data:** This is data relating to your phone number, addresses, email addresses, phone numbers.
- **Marketing and Communications Data:** This is your preferences in receiving marketing information and other information from us.
- **Investment Suitability Information:** This is used to assess your tolerance to investment risk and whether investment products offered by Count are suitable for you. This includes, but is not limited to, your investment experience, tolerance to risk, investing time horizon, and your monthly incomings and outgoings.
- **Financial Information:** This is used to provide a holistic overview of your financial situation. This may include your income, residential status, employment information, credit rating, CCJ's or bankruptcy.
- **Transaction history and other reports:** This relates to things such as contributions, transfers and withdrawals made on your account.
- **Health and Disability Data:** This is data that would be relevant to your use of Counts services that might aid us in providing accessible options to help you achieve a good outcome. This data may be collected via your own disclosure or information collected as part of our fact find.

- **Communication Data:** This data is relating to records and results of any communications between you and Count.
- **Device and technical Data:** This refers to things such as unique device identifiers, IP addresses, device type and model as well as operating system and version.
- **Usage Data:** This is generated in the app and shows us what screens or product features you use and how long you spend using the features.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

2.2 The Legal Basis for Collecting That Data

There are a number of justifiable reasons under the GDPR that allow collection and processing of Personal Data. The main avenues we rely on are:

“Consent”: Certain situations allow us to collect your Personal Data, such as when you tick a box that confirms you are happy to receive email newsletters from us, or ‘opt in’ to a service.

“Contractual Obligations”: We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.

“Legal Compliance”: We’re required by law to collect and process certain types of data, such as fraudulent activity or other illegal actions.

“Legitimate Interest”: We might need to collect certain information from you to be able to meet our legitimate interests - this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your address, so that we know where to deliver something to, or your name, so that we have a record of who to contact moving forwards.

3 HOW WE USE YOUR DATA

These are reasons we might use your data:

3.1 Client onboarding

This includes setting up your account with us and fulfilling our regulatory compliance obligations include ‘Know Your Customer’ (KYC) checks and your investment risk level. It also includes confirming and verifying your identity. In order to create an account we need

to collect some personal information which allows us to verify your identity and assess your tolerance to investment risk and capacity for loss. You may provide us with this information as part of the account opening process through our mobile app. We authenticate your use of our services and check against sanctions lists and other legal restrictions. It also includes taking all other necessary steps to make Counts Services available to you.

3.2 Providing you with client support and communicating with you

We record all interactions including, but not limited to, emails, phone calls, web chat and complaints. We will also generate and keep a record of any mandatory or ad hoc statements and reports we produce for you.

3.3 Operating your account

On a day-to-day basis we process information necessary for your account to function correctly, for us to operate your investment account and to perform our contractual obligations. This can range from details required for us to trade your investments, to data necessary for our technology infrastructure to run. This information is usually generated automatically by your account and our systems or may be collected as a result of an interaction you have with our client support team.

3.4 Fraud Prevention

This includes detecting, preventing and investigating fraud throughout our relationship with you.

3.5 Providing you with advice

Where you have decided to take advantage of Counts advice product and have engaged with our App, we will process your information, including your financial advice fact find to provide you with our recommendation.

3.6 Facilitate your use of third-party services

With your permission, providing you services, such as Open Banking, with access to your account information.

3.7 Marketing

For contacting you with investment updates, new features, and offers. This might be via email, phone call, in app notification or online through social media ads or ads we place on websites you visit. We use this information to understand how you interact with our app, our website, social media channels and our online ads through analysing activity and

behaviour. It also helps us understand people who are interested in becoming clients and build our marketing campaigns and services, how you engage with our emails, and the content we share. You have a right to object to this use of your data if you disagree with our use of it for this purpose.

3.8 Personalisation of our services

We may employ common tracking technology, such as cookies, to understand how you interact with our website and app for the purpose of showing you content on it that we think is most relevant to you.

3.9 To meet our financial operating standards

This includes internal and regulatory reporting and business oversight such as internal audits and to produce reports to analyse our performance and manage our finances.

3.10 Research

This includes speaking to you to collect your views and opinions on our brand, products and services we are looking to develop or how we are doing in relation to our existing products and your experience with us as a client.

3.11 Security

This includes maintaining the security of our website and our app.

3.12 IT Operations

This includes the management of our communications systems, operation of IT security and IT security audits.

3.13 Improving Counts services and products

This includes understanding how you interact with and use our app, website and social media pages. It also includes understanding how you interact with our app or website and allows us to improve on what works, what doesn't and build new services for you.

3.14 Investigations

This includes detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.

3.15 Legal compliance and legal proceedings

For compliance with our legal and regulatory obligations under applicable law and for us to establish, exercise and defend our legal rights.

4 YOUR RIGHTS AND HOW YOU ARE PROTECTED BY US

4.1 Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

Right to be informed. You have a right to be informed about our purposes for processing your personal data, how long we store it for, and who it will be shared with. We have provided this information to you in this policy.

Right of access. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it (also known as a "data subject access request"). See section 4.4 below for more details on how you can make a data subject access request.

Right to rectification. You have a right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Right to erasure. You have the right to ask us to delete or remove personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Right to object. You can object to the processing of personal data we hold about you. This effectively allows you to stop or prevent us from processing your personal data. Note that this is not an absolute right and it only applies in certain circumstances, for example:

- i. Where we are processing your personal data for direct marketing purposes.
- ii. Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- iii. In some cases, we may continue processing your data if we can demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Right to restrict processing. You have the right to request the restriction or suppression of their personal data. Note that this is not an absolute right and it only applies in certain circumstances:

- i. If you want us to establish the data's accuracy.
- ii. Where our use of the data is unlawful but you do not want us to erase it.
- iii. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- iv. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Right to data portability. You have the right to request the transfer of your personal data to you or to a third party. If you make such a request, we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to make a request under any of these rights, please contact us at hello@count-finance.com.

4.2 How Count protects customers' Personal Data

We are concerned with keeping your data secure and protecting it from inappropriate disclosure. Any Personal Data collected by us is only accessible by a limited number of employees who have special access rights to such systems and are bound by obligations of confidentiality. If and when we use subcontractors to store your data, we will not relinquish control of your Personal Data or expose it to security risks that would not have arisen had the data remained in our possession. However, unfortunately no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of Count to intercept or access transmissions or private communications unlawfully. While we strive to protect your Personal Data, we cannot ensure or warrant the security of any Personal Data you transmit to us. Any such transmission is done at your own risk. If you believe that your interaction with us is no longer secure, please contact us.

4.3 Opting out of marketing promotions

You can ask us to stop sending you marketing messages at any time by unsubscribe from newsletter. Where you opt out of receiving these marketing messages, we will continue to retain other Personal Data provided to us as a result of interactions with us not related to

your
marketing preferences.

4.4 How to request your data and the process for obtaining it

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, if your request is clearly unfounded, we could refuse to comply with your request.

We may need to request specific information from you to help us confirm your identity and ensure you have the right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

5 YOUR DATA AND THIRD PARTIES

5.1 Sharing your data with third parties

We may also share Personal Data with interested parties in the event that Count anticipates a change in control or the acquisition of all or part of our business or assets or with interested parties in connection with the licensing of our technology. If Count is sold or makes a sale or transfer, we may, in our sole discretion, transfer, sell or assign your Personal Data to a third party as part of or in connection with that transaction. Upon such transfer, the Privacy Policy of the acquiring entity may govern the further use of your Personal Data. In all other situations your data will still remain protected in accordance with this Privacy Policy (as amended from time to time). We may share your Personal Data at any time if required for legal reasons or in order to enforce our terms or this Privacy Policy.

5.2 Banks and Payment Providers

To process payments from or to your account.

5.3 Open Banking Providers

If you authorise them, we'll share data about your account so their services work for you.

5.4 Service Providers

So they can help us provide you with Counts services. Examples include vendors who host our database, or vendors who assist us with our marketing efforts.

5.5 Courts Service

We may be required to share your data in relation to a legal filing or claim in the exercise or defence of legal rights or obligations.

5.6 Government Bodies, Agencies, Regulators and Authorities

We can be asked to share your data with these bodies on a regular or ad hoc basis. Examples include the UK Financial Conduct Authority and HM Revenue and Customs.

If you're a tax resident of a country other than the UK, we may be required to share information about you and your accounts with the relevant tax authorities. The obligations can ask for us to share this information directly, or through the local tax authority. The relevant tax authorities can share that information with other appropriate tax authorities or government bodies. We may ask you to provide us with extra information or to fill in tax forms to help us with this.

5.7 Fraud Prevention Agencies

To prevent fraud and money laundering We share data with search databases or receive data from fraud prevention and credit reference agencies, as part of our client onboarding process and during your relationship with us as a client.

5.8 Law Enforcement and Fraud Detection Agencies

To help with the detection, prevention and investigation and prosecution of criminal activities, including fraud and money laundering.

6 HOW LONG WE RETAIN YOUR DATA

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your Personal Data for a longer period than usual in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

7 INTERNATIONAL TRANSFER OF DATA

Your information may be stored and processed in the UK or other countries or jurisdictions outside the UK where Count has facilities. By using count, you are permitting and consenting to the transfer of information, including Personal Data, outside of the UK.

8 DATA MINIMISATION

We take reasonable steps designed to ensure that the data we process is limited to the data reasonably required in connection with the purposes set out in this notice.

9 NOTIFICATION OF CHANGES AND ACCEPTANCE OF POLICY

We keep our Privacy Policy under review and will place any updates here. This version is dated 1st of July 2025.

By using Count, you consent to the collection and use of data by us as set out in this Privacy Policy. Continued access or use of Count will constitute your express acceptance of any modifications to this Privacy Policy.

10 INTERPRETATION

All uses of the word "including" mean "including but not limited to" and the enumerated examples are not intended to in any way limit the term which they serve to illustrate. Any email addresses set out in this policy may be used solely for the purpose for which they are stated to be provided, and any unrelated correspondence will be ignored. Unless otherwise required by law, we reserve the right to not respond to emails, even if they relate to a legitimate subject

matter for which we have provided an email address. You are more likely to get a reply if your request or question is polite, reasonable and there is no relatively obvious other way to deal with or answer your concern or question (e.g. FAQs, other areas of our website, etc.).

Our staff are not authorised to contract on behalf of Count, waive rights or make representations (whether contractual or otherwise). If anything contained in an email from a Count address contradicts anything in this policy, our terms or any official public announcement on our website, or is inconsistent with or amounts to a waiver of any Count rights, the email content will be read down to grant precedence to the latter. The only exception to this is genuine correspondence expressed to be from the Count legal department.