

Privacy Data Policy

Count Finance LTD

Last Updated: July 2025

1. Introduction

Count Finance LTD ("we", "us", or "our") is committed to protecting the privacy and security of your personal data. This Privacy Data Policy explains how we collect, use, and protect your personal information in accordance with the General Data Protection Regulation (GDPR) and applicable UK data protection laws.

2. Data Collection

We may collect and process the following types of personal data:

- **Contact Information:** Such as your name, email address, postal address, and phone number.
- **Account Information:** If you create an account with us, we may collect your username, password, and other account details.
- **Payment Information:** When you make a purchase, we may collect your payment card details or other payment information.
- **Usage Information:** We may collect information about how you use our website, products, and services, including your browsing history, IP address, and device information.
- **Other Information:** Any other information you voluntarily provide to us or that we collect in the course of providing our services.

3. Use of Data

We may use your personal data for the following purposes:

- To provide and maintain our products and services.
- To communicate with you, including responding to your inquiries and providing customer support.
- To process transactions and fulfil orders.
- To send you marketing communications, promotions, and other information about our products and services that may be of interest to you.
- To personalise and improve your experience with our website, products, and services.
- To comply with legal and contractual obligations and protect our rights and interests.

We process your personal data based on the following legal grounds under UK data protection law:

(A) **Website Visitors:**

- Legitimate Interests: To analyse website usage, improve our services, and ensure website security. Our legitimate interest is to operate and improve our website effectively.
- Consent: For non-essential cookies and similar technologies (where required).

(B) Newsletter Subscribers:

- Consent: To send you marketing communications and newsletters. You can withdraw this consent at any time by unsubscribing.

(C) Platform Users:

- Contract Performance: To provide our financial services, process transactions, maintain your account, and fulfil our obligations under our terms of service.
- Legal Obligation: To comply with financial services regulations, anti-money laundering requirements, know-your-customer (KYC) obligations, and other legal requirements.
- Legitimate Interests: To improve our services, conduct fraud prevention, ensure platform security, and provide customer support.

4. Data Sharing

We may share your personal data with third parties in the following circumstances:

- With service providers and vendors who assist us in operating our business and providing our products and services. These third parties are contractually bound to only process your personal data on our behalf and in accordance with our instructions.
- With our affiliates and business partners for marketing and other purposes, where you have provided consent for such sharing.
- In connection with a corporate transaction, such as a merger, acquisition, or sale of assets.
- When required by law or to protect our rights and interests.

In particular, please note that we are an agent of Plaid Financial Ltd., an authorised payment institution regulated by the Financial Conduct Authority under the Payment Services Regulations 2017 (Firm Reference Number: 804718). Plaid provides you with regulated account information services through us as its agent and therefore we will share certain personal data with Plaid Financial Ltd. for the purposes outlined above.

5. Data Security

We take reasonable measures to protect your personal data from unauthorised access, disclosure, alteration, and destruction. However, please note that no method of transmission over the internet or electronic storage is 100% secure.

6. Data Storage and Processing Locations

Please note that your personal data may be stored and/or processed outside of the United Kingdom. By using our services, you consent to the transfer of your personal data to these locations.

7. International Transfers

Your personal data may be transferred to and processed in countries outside the United Kingdom and European Economic Area, including, but not limited to, through our use of cloud service providers.

When we transfer your personal data internationally, we ensure appropriate safeguards are in place, including:

- Standard Contractual Clauses approved by the UK Information Commissioner's Office
- Data Processing Agreements with our service providers that include adequate data protection obligations
- Regular monitoring of the security and privacy practices of our international service providers

8. Data Retention

We retain your personal data for the following periods:

- **Account Information:** For the duration of your account plus 6 years after closure for regulatory compliance
- **Transaction Data:** 6 years from the transaction date as required by financial regulations
- **Communication Records:** 3 years from last contact
- **Marketing Data:** Until you withdraw consent or 2 years of inactivity
- **Website Usage Data:** 13 months from collection

We may retain data longer where required by law or for the establishment, exercise, or defence of legal claims.

9. Your Rights and Automated Processing

Under the GDPR, you have the following rights regarding your personal data:

- **Right to Access:** You have the right to request access to the personal data we hold about you.
- **Right to Rectification:** You have the right to request that we correct any inaccuracies in your personal data.
- **Right to Erasure:** You have the right to request that we erase your personal data under certain circumstances.
- **Right to Restriction of Processing:** You have the right to request that we restrict the processing of your personal data under certain circumstances.
- **Right to Data Portability:** You have the right to receive a copy of your personal data in a structured, commonly used, and machine-readable format.

- **Right to Object:** You have the right to object to the processing of your personal data under certain circumstances.
- **Right to Withdraw Consent:** Where we rely on your consent as the legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can do this by contacting us using the details below. Withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal.

We use automated systems and algorithms to:

- Assess your eligibility for our financial services and determine appropriate products for your needs
- Conduct know-your-customer (KYC) checks and ongoing compliance monitoring through our KYC service providers.
- Analyse your financial data to provide personalised financial support and recommendations

These automated processes may significantly affect the services we can offer you, including determining:

- Your eligibility to use our platform and specific features
- The financial products and services available to you
- Account limits and restrictions

You have the following rights regarding automated decisions:

- You have the right to request human review of any automated decision
- You can express your point of view and contest the decision
- You may request an explanation of the logic used in the automated decision-making process

To exercise the rights outlined in this section, please contact us using the details in Section 12.

10. Complaints Procedure

If you have any complaints or concerns regarding our handling of your personal data or our data protection practices, please contact us using the contact information provided below. We take all complaints seriously and will investigate and address your concerns promptly and in accordance with applicable laws and regulations.

11. Supervisory Authority and Complaints

You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters, if you believe we have not handled your personal data in accordance with data protection law.

You can contact the ICO at:

- Website: ico.org.uk
- Helpline: 0303 123 1113

- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

12. Contact Us

If you have any questions or concerns about this Privacy Data Policy or our data practices, please contact us at:

Count Finance LTD
167-169 Great Portland Street, 5th Floor
London, W1W 5PF
Email: hello@count-finance.com