Privacy Policy

Arda Capital Limited
19 Berkeley Street, London, W1J 8ED
Registered in England & Wales, Company Number: 06805506
Authorised and Regulated by the Financial Conduct Authority, Firm Reference Number: 541623

Introduction

1. Important Information and Who We Are

1.1. Purpose of This Privacy Policy

Arda Capital Limited ("Arda" or "we") respects your privacy and is committed to protecting your Personal Data. This Privacy Policy applies to how we collect, process, and store your Personal Data through our online services, our Android and iOS Mobile apps, recipients of our emails, or when you otherwise interact with us. It describes the types of Personal Data we obtain, how we use it, and with whom we share it. We also describe your rights, how the law protects you, and how you can contact us about our privacy practices, including how to make a data protection complaint directly to us.

References to "Arda", "we", "us" and "our" collectively refer to Arda Capital Limited. References to the "Information Commission" refer to the body formerly known as the Information Commissioner's Office ("ICO"), as renamed by the DUAA 2025

1.2 Identity and the Contact Details of the Controller

For the purposes of the UK General Data Protection Regulation ("UK GDPR") (as amended by the DUAA 2025), Arda Capital Limited is the data controller responsible for the Personal Data we collect or that you provide to us.

If you have any questions about this Privacy Policy, how we collect, use or disclose Personal Data, or wish to update information we hold about you, please contact us:

- By email: compliance@ardacap.com
- By post: 19 Berkeley Street, London, W1J 8ED

1.3 Data Protection Contact

We have not appointed a dedicated Data Protection Officer. However, the person responsible for Data Protection can be contacted directly at: compliance@ardacap.com

2 The Data We Collect About You and How We Use It

We will only use your Personal Data when the law allows us to. The lawful bases we rely on are:

2.1 Consent

When you give us your consent, for example, to access contacts on your phone or allow access to your location. You have the right to withdraw consent at any time via the Privacy Settings in our Android or iOS Mobile app or by contacting us at compliance@ardacap.com.

2.2 Contract

When we need to execute a contract, you have entered into with us. Where we need to collect Personal Data under the terms of a contract and you fail to provide that data, we may not be able to perform the contract and may have to cancel a service, but we will notify you if this is the case.

2.3 Legal or Regulatory Obligation

When we are required to collect Personal Data by law or regulation. Failure to provide that data may result in us being unable to perform our services, and we will notify you at that time.

2.4 Legitimate Interests

Updated lawful basis — DUAA 2025

Legitimate Interest means the interest of Arda in processing your Personal Data, or the benefit Arda derives from that processing.

Where we rely on legitimate interests, we consider and balance any potential impact on you and your rights before we process your Personal Data. Under the DUAA 2025, certain processing activities are designated as 'recognised legitimate interests', meaning they are automatically treated as a legitimate basis for processing without a full Legitimate Interests Assessment (LIA) being required. These include certain fraud prevention, network security, and public safety-related activities. For all other legitimate interests processing, we continue to conduct a full LIA.

We may also process certain special categories of data such as criminal convictions and biometric data where we are lawfully permitted to do so, and only for limited purposes such as fraud or money laundering and terrorist financing prevention and detection. Apart from this, we do not collect Special Categories of Personal Data about you (including details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information or genetic data).

We also collect, use and share Aggregated Data (statistical or demographic data) for any purpose. Aggregated Data is not considered Personal Data in law as it will not directly or indirectly reveal your identity. If we combine Aggregated Data with your Personal Data so that it can identify you, we treat the combined data as Personal Data subject to this Privacy Policy.

The table below sets out all the ways we plan to use your Personal Data and the legal basis we rely on to do so. Note that we may process your Personal Data for multiple legal reasons.

Type of Data	Purpose / Activity	Lawful Basis
Submitted information: *Full legal name, Nationality/Citizenship, Avatar, Passport / ID photo, Address, Proof of Address, Proof of Source of Funds, Tax declaration, Payslip, Country of Residence/Citizenship, Passport dates, Email address, Phone number, Liveness Selfie, Date of Birth*	To verify your identity and liveness, to comply with financial crime and AML/CTF laws, protect against fraud, and confirm your eligibility to use our services.	Legal obligation and legitimate interest (prevention of fraud, misuse of services, money laundering).

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Type of Data	Purpose / Activity	Lawful Basis
	To notify you about changes to our service and this Privacy Policy.	Legitimate interest (efficiency in meeting regulatory obligations).
	To comply with automatic exchange of financial account information between tax authorities.	Legal obligation.
	To carry out contractual obligations arising from any transactions you conduct.	Fulfilling contracts.
	To provide you with information updates about our services.	Fulfilling contracts.
User content: *Customer service and marketing communications, ratings and other content you provide.*	To carry out contractual obligations arising from transactions and placement of orders.	Fulfilling contracts.
	To provide a consistent experience for users on the platform.	Legitimate interest (product improvement).
	To facilitate real-time social interactions through our app.	Your consent.
	To communicate with customers via SMS to notify them of critical actions required.	Legitimate interest (ensuring customers act on critical requests).
Transactional Data: *Transaction Amount, Account Number, Beneficiary Data, User/Account ID, Destination Institution.*	To carry out contractual obligations arising from financial transactions.	Fulfilling contracts.
	To comply with financial crime and AML/CTF laws.	Legal obligation and legitimate interest (prevention of fraud and money laundering).

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Type of Data	Purpose / Activity	Lawful Basis
	To comply with automatic exchange of financial account information between tax authorities.	Legal obligation.
Device information: *Browser type and version, time zone, IP address, operating system, device type, unique device identifier.*	To verify your identity, comply with financial crime and tax laws, protect against fraud, and confirm eligibility.	Legal obligation.
	To administer, improve and secure our site and app.	Legitimate interest (improving products and services).
Geolocation information: *Location identified by longitude/latitude, GPS, Wi-Fi or similar.*	To maintain your eligibility as an Arda user.	Fulfilling contracts.
	To verify your registered address during onboarding.	Legitimate interest (improving customer experience).
	To verify users' location while using our services to combat financial fraud.	Legitimate interest (prevention of fraud and misuse of services).
	To provide location-specific options, functionality, or content.	Your consent and legitimate interest.
Marketing campaigns: *Email address, Full legal name, Country of Residence.*	To provide you with information regarding Arda products and services.	Your consent.
Statistical / usage information: *Full URLs, page lengths of visits, clickstream, page response times,*	To administer, improve and secure our site and app, and to provide you with information about goods and services.	Legitimate interest (developing new products and services and keeping you updated).

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Type of Data	Purpose / Activity	Lawful Basis
downloads, page interaction data.		

2.5 Marketing

We are committed to providing you with choices regarding your Personal Data, particularly around marketing and advertising. We will get your consent before sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to receive third-party marketing at any time by contacting us.

You can expect to receive marketing communications from us if you have requested information or purchased services from us and you have not opted out of receiving that marketing.

2.6 Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. We will delete Personal Data after fulfilling the intended purpose or after expiration of the applicable storage periods. If we need to use your data for an unrelated purpose, we will notify you and explain the legal basis.

3 How Your Personal Data Is Collected

3.1 Information That You Provide to Us

Personal Data that you provide directly to us should be apparent from the context in which you provide it. For example, when you use our services, we collect your name, email address, and transaction information to complete your transactions. We will process Personal Data you choose to provide through our website and Mobile Apps, including your first and last name, physical address, email address, mobile device identifier, and transactional data.

3.2 Information That We Collect Automatically

We use cookies, action tags and third-party analytics tools to collect data about your visit and usage of our services. This may include your IP address, browser type and version, operating system, geographic location, device identifiers, and movements on our online services.

3.3 Cookies

Cookie rules updated — DUAA 2025/PECR amendments (in force from 5 February 2026

We use cookies on our website. Under the DUAA 2025's amendments to the Privacy and Electronic Communications Regulations (PECR), which came into force on 5 February 2026, the following categories of cookies no longer require your prior consent to be set:

- Analytics cookies — used solely to collect aggregate statistics to measure and improve website/app performance
- Functionality cookies — used to adapt how the site or app looks or works based on your device or preferences
- Security cookies — used for fraud prevention and device security
- Software update cookies — used to deliver updates to our services

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For these exempt cookies, we do not need your active opt-in consent; however, we are still required to clearly inform you about their use (as we do in this Privacy Policy and our Cookie Policy) and to provide you with a simple, free mechanism to opt out at any time.

The following types of cookies still require your prior consent under PECR:

- Advertising and targeting cookies
- Most third-party tracking cookies
- Social media plug-in cookies

Please note that PECR penalty levels have been raised by the DUAA 2025 to align with the UK GDPR — up to £17.5 million or 4% of global annual turnover for breaches, making cookie compliance more important than ever.

For full details about the cookies, we use and to manage your cookie preferences, please see our Cookie Policy. You can also adjust your browser settings to control cookies.

3.4 Action Tags

We may use action tags to identify pages you visit and how you use the content on those pages. Action tags collect and transmit data in a manner that identifies you if you have registered with our website and are logged into our Mobile apps. We may also use action tags in our emails to determine whether an email was opened or forwarded.

3.5 Do Not Track

Your browser settings may allow you to transmit a "Do Not Track" signal. Like many websites, we do not currently process or respond to "Do Not Track" signals. If we do so in the future, we will describe how in this Privacy Policy.

3.6 Information from Third Parties and Publicly Available Sources

Category of Data Providers	Type of Data	Country of Establishment
Analytics providers, advertising networks, search information providers	Technical Information, Usage Data, Demographic Data, Device Identifiers	UK
Technical, payment and delivery service providers	Personal Identifiable Information, KYC/AML Data, Customer Account Data, Customer Communications	UK
Data brokers or aggregators	Consumer Demographic Data, Third-Party Risk or KYC Data	UK
Publicly available sources (e.g. Companies House, Electoral Register)	Company information, Individual names and addresses	UK

3.7 Third Party Links

Our website and Mobile apps may include links to third-party websites, plug-ins and applications. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. We encourage you to read the Privacy Policy of every website or app you visit. We are not responsible for the security of data you transmit over the Internet or provide directly to a third party's website.

4 Anti Money Laundering and Combating Terrorist Financing

Money laundering is defined as the process where the sources of funds are disguised so as to give an impression of legitimate income. Criminals target financial services firms to launder criminal proceeds without the firms' knowledge or suspicion.

We process your Personal Data for AML/CTF purposes as described in the AML/KYC Privacy Notice below (section 10). The legal framework underpinning these obligations includes:

- The Money Laundering and Terrorist Financing (Amendment) (EU Exit) Regulations
- The Money Laundering and Terrorist Financing (Amendment) Regulations 2019
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- The Criminal Finances Act 2017
- The Proceeds of Crime Act 2002
- The Terrorism Act 2000 (as amended)
- The Terrorist Asset-Freezing etc Act 2010
- Counter-terrorism Act 2008, Schedule 7

5 Information We Share; Data Transfers

We do not sell or otherwise disclose Personal Data that you provide to us or that we collect through our services, except as described in this section:

- Marketing materials from third parties if you have provided consent
- Professional advisers such as lawyers, banks, auditors and insurers providing such services
- Regulators and other authorities who require reporting of processing activities in certain circumstances
- Where required by applicable laws or legal process
- To protect the rights, property and safety of Arda, our users and the public — for example, in connection with court proceedings, to detect or prevent criminal activity or fraud
- Gathering your rating of our app, which is processed through a third-party service provider

5.1 International Data Transfers

Updated — DUAA 2025 'Data Protection Test' and UK-US Data Bridge

Arda is headquartered in the UK. We may transfer your data to countries outside the UK/EEA to the extent necessary to perform our services.

Under the DUAA 2025, a new 'data protection test' applies to international transfers. Before transferring personal data to a third country, we must assess whether the standard of data protection in the destination country is 'not materially lower' than the standard in the UK. This test applies both to formal adequacy assessments and to our own assessment before relying on standard contractual clauses or other appropriate safeguards.

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Transfers to countries within the EEA are not restricted. For transfers to countries outside the UK/EEA, we rely on one or more of the following safeguards:

- An adequacy decision made by the UK Secretary of State confirming that the destination country provides an adequate level of data protection
- Standard contractual clauses (SCCs) approved by the UK Secretary of State or the Information Commission
- Binding corporate rules
- Compliance with an approved code of conduct or certification mechanism

Regarding transfers to the United States: the UK-US Data Bridge (a UK adequacy decision under the UK Extension to the EU-US Data Privacy Framework) came into force on 12 October 2023. UK companies may transfer personal data to US organisations certified under the Data Privacy Framework without additional safeguards. Where we rely on this mechanism, we will confirm it in our processing records. The EU-US Data Privacy Framework survived its first legal challenge before the EU General Court in September 2025, though further challenges remain possible; we monitor developments and maintain backup transfer mechanisms accordingly.

Please note: the previous reference in this Privacy Policy to "Privacy Shield" has been removed, as that framework was invalidated by the CJEU's Schrems II decision in July 2020 and has been superseded by the mechanisms described above.

Further details on our transfer safeguards can be obtained by contacting compliance@ardacap.com.

6 Security Measures

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your Personal Data to those employees, agents, contractors and other third parties strictly required under the provisions of a service agreement with them. They will only process your Personal Data on our instructions and are subject to duties of confidentiality and compliance with data protection procedures.

We have put in place procedures to deal with any suspected or actual Personal Data breach. We will notify you and any applicable authority of a breach where we are legally required to do so.

7 Protection of Minors

Arda does not knowingly collect or solicit Personal Data from anyone under the age of 18. If you are under 18, please do not attempt to register for our services or send any Personal Data about yourself to us.

In accordance with our obligations under the Children's Code (Age Appropriate Design Code) and the requirements of the DUAA 2025, which requires online service providers to explicitly consider children's interests when processing personal data, we have assessed our services and implemented appropriate safeguards.

8 Data Retention

We retain information about you for as long as your account is active, or as is reasonably needed to fulfil the purposes for which we collected it and to provide our services, and as required by applicable

laws, including to comply with our legal, regulatory, tax, accounting or reporting obligations, to resolve disputes or complaints, and to enforce our agreements.

In some circumstances we will anonymise your Personal Data for research or statistical purposes, after which it ceases to be Personal Data, and we may use it without further notice to you. Please note that when interacting with the blockchain we may not be able to ensure that your Personal Data is deleted.

Type of Data	Retention Period	Justification
Details of third-party service providers (name, address, bank details)	6 years from date of expiration/termination of the contract (or duration of renewal)	Contractual requirements.
Details of suppliers (email, name, address, bank details)	6 years from date of expiration/termination of the contract (or duration of renewal)	Settling invoices, payment for services, and defending/establishing potential legal claims.
Suspicious transaction/activity reports	Upon expiration of purpose or AML/CFT retention requirement of 5 years minimum under AML, or expiration of relationship plus 6-year limitation period	Compliance with AML/CFT and KYC obligations.
Client identification data (full name, liveness selfies, national ID, address, date of birth, phone, email, bank info, security selfies, IP, OS, location, KYC/blockchain data)	Upon expiration of relationship or regulatory requirement — minimum of 5 years post-termination	Compliance with AML/CFT and KYC obligations.
Data collected as part of account creation/app and platform usage	Upon account termination, save for transaction data which may need to be retained for 6 years. Maximum of 5 years for KYC and AML/CFT ongoing monitoring.	Contractual requirements; legal obligation under the Income Tax Act; KYC/CDD obligations under AML/CFT legislation.

9 Your Rights and Choice

9.1 Right to Information and Access

You have the right to be informed about the processing of your Personal Data and to access your Personal Data held by us. To exercise this right, contact us at compliance@ardacap.com.

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When handling Subject Access Requests (SARs), consistent with the DUAA 2025, our obligation is to provide data found following a reasonable and proportionate search of our systems and records. We may also pause the SAR response clock where we need to verify your identity or request clarification about the scope of your request; the clock restarts once that information is received. We will inform you promptly if we pause the clock and why.

9.2 Right to Rectification

You have the right to have inaccurate or incomplete Personal Data about you corrected. If you need to advise us of any changes to your Personal Data, please contact us using the details provided in this Privacy Policy.

9.3 Right to Erasure ('Right to be Forgotten')

You have the right to request the erasure of your Personal Data in the following circumstances:

- The Personal Data is no longer necessary for the purpose for which it was collected
- You withdraw your consent and no other legal justification applies
- We unlawfully processed your Personal Data
- Erasure is required to comply with a legal obligation

Please be aware that by requesting erasure, we will need to close your Arda account; this action is not reversible, and we will no longer be able to provide Arda's services to you. This does not affect the lawfulness of any processing carried out before your erasure request. Where we interact with blockchain, we may not be able to ensure deletion.

We may refuse an erasure request where continued retention is necessary to: comply with a legal obligation under applicable law; establish, exercise or defend legal claims.

9.4 Right to Restrict Processing

You have the right to restrict processing of your Personal Data where: you contest its accuracy; you believe processing is unlawful and prefer restriction over erasure; we no longer need the data, but you require it for legal claims or regulatory requirements. Restricting processing may require us to close your Arda account.

9.5 Right to Data Portability

Where the legal basis for processing your Personal Data is consent or contract, and processing is carried out by automated means, you have the right to receive your Personal Data in a structured, commonly used and machine-readable format.

9.6 Right to Object to Direct Marketing

You have the right to object to the processing of your Personal Data for direct marketing purposes. On each marketing communication, we will provide an option to exercise this right by clicking the 'unsubscribe' button or similar opt-out mechanism. Administrative or service-related communications generally do not offer an option to unsubscribe as they are necessary to provide the services you have requested.

9.7 Right to Object – Other Processes

You also have the right to object to processing based on legitimate interests or for scientific/historical research and statistics. If you object, we will cease processing unless we can demonstrate compelling

legitimate grounds that override your interests, rights and freedoms, or the processing is necessary for the exercise or defence of legal claims.

9.8 Right to Withdraw Consent

Where the legal basis for processing is your consent, you may withdraw that consent at any time by contacting compliance@ardacap.com or via the Privacy Settings in our Mobile app. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal. Please be aware that withdrawal may require us to close your Arda account.

9.9 Rights Related to Automated Decision Making

Updated — DUAA 2025 liberalised ADM framework

We use semi-automated processes including screening of KYC and AML data to assess whether we are legally able to allow you to use our services. All automated screening matches are manually reviewed by Arda compliance analysts, who determine whether cases should be cleared or escalated to the MLRO.

Under the DUAA 2025, the framework governing automated decision-making (ADM) has been updated. Where Arda makes significant automated decisions about you (i.e. decisions made solely by automated means that produce legal or similarly significant effects), you have the following rights regardless of the lawful basis relied upon:

- To be clearly informed that your data is subject to automated decision-making and how that process works
- To contest an automated decision
- To request meaningful human review of the decision

Where automated decisions involve special category data (such as health or biometric data), stricter conditions continue to apply. Our compliance analysts provide the human review mechanism for all significant automated screening decisions.

9.10 How to Exercise Your Rights

You can exercise any of the above rights free of charge by contacting us at compliance@ardacap.com. Most rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request.

10. Data Protection Complaints

New mandatory complaints mechanism — DUAA 2025 (in force from 19 June 2026)

Under the Data (Use and Access) Act 2025, Arda is required to maintain a formal process for handling data protection complaints made directly to us. We encourage you to contact us first before escalating to the Information Commission, as we may be able to resolve your concern quickly and directly.

If you believe we have handled your Personal Data in a manner that infringes the UK GDPR or applicable data protection law, you have the right to make a complaint directly to Arda. Our complaints process works as follows:

- Submit your complaint: contact us at compliance@ardacap.com, in writing to **19 Berkeley Street, London, W1J 8ED**
- Acknowledgement: we will acknowledge receipt of your complaint within 30 days

- Investigation: we will make reasonable enquiries and investigate your complaint without undue delay, keeping you informed of progress
- Outcome: we aim to provide a substantive response and outcome within three months of receipt, unless exceptional circumstances apply. Outcomes will be communicated in plain, accessible language
- Escalation: you will be informed of your right to escalate to the Information Commission if you are dissatisfied with our response

All complaints received and their outcomes are logged and reviewed by our Data Protection contact as part of ongoing compliance monitoring.

11 Supervisory Authority — Right to Lodge a Complaint

If we have not responded to you within a reasonable time, or if you feel your complaint has not been resolved to your satisfaction, you have the right to lodge a complaint with the Information Commission (formerly the Information Commissioner's Office):

The Information Commission
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF
Telephone: 0303 123 1113
Website: www.ico.org.uk

12 Updates to This Privacy Policy

We keep this Privacy Policy under regular review. Changes may become necessary as we develop our online services and Mobile apps, to implement new legal requirements (including further provisions of the DUAA 2025 as they are phased in through 2026), or to improve our services. If we change this Privacy Policy in the future, we will post the revised version on our website www.ardacap.com together with the version number and date of change. You should check this Privacy Policy from time to time when you visit our website.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

13 AML/KYC Privacy Notice

We will process your identifying data and profile data within operations such as identification (Know Your Customer, "KYC") and profiling (Customer Due Diligence, "CDD") for the purposes of our Anti-Money Laundering ("AML") and Counter-Terrorism Financing ("CTF") customer identification and verification obligations.

When Arda requests CDD, this refers to proof of address and proof of identification. Without KYC, we may unknowingly become involved with illicit activities and therefore face reputational, operational and legal risks. Failure to provide required KYC/CDD information may (in extreme cases) lead to the blocking of accounts or refusal of services.

13.1 AML Policies

Our AML policy is designed to prevent money laundering by meeting UK standards, including having adequate systems and controls in place to mitigate the risk of being used to facilitate financial crime.

Our AML policy sets out minimum standards, including:

- Appointing a Money Laundering Reporting Officer (MLRO) with sufficient seniority and independence
- Establishing and maintaining a Risk-Based Approach (RBA) to assessing and managing money laundering and terrorist financing risks
- Establishing risk-based Customer Due Diligence, KYC and verification procedures, including enhanced due diligence for higher-risk customers such as Politically Exposed Persons (PEPs)
- Establishing systems and procedures for monitoring ongoing customer activity
- Establishing procedures for reporting suspicious activity internally and to relevant law enforcement authorities
- Maintaining appropriate records for prescribed minimum periods
- Providing training for and raising awareness among relevant employees

13.2 Sanctions Policy

Arda is prohibited from transacting with individuals, companies and countries on prescribed sanctions lists. We screen against United Nations, European Union, UK Treasury and US OFAC sanctions lists in all jurisdictions in which we operate.

13.3 Automated Decision Making in AML/KYC

We use semi-automated processes, including screening KYC and AML data, to assess whether we are legally able to allow you to use our services. All automated screening matches are manually reviewed by Arda compliance analysts, who determine whether cases should be cleared or escalated to the MLRO. This human review process forms the mandatory safeguard required under the DUAA 2025 for significant automated decisions.

13.4 Third Parties AML/KYC Processors

Where processing of personal data is carried out on behalf of Arda by a third-party provider, we conclude a separate contract with that processor to ensure compliance with UK data protection regulations and to define appropriate technical and organisational safeguards for the protection of your rights.

14 Categories of Providers

Category	Service Description	Jurisdiction
Infrastructure	Cloud computing	UK
Legal	Consulting (lawyers, auditors); public bodies in connection with court proceedings, detecting or preventing criminal activity, fraud, or establishing legal rights	UK

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Finance	Accountancy, insurers, banking institutions and payment services	UK
Human Resources	Human resources software as a service	UK
Product	Document sharing	UK
Compliance	Client/institutional onboarding and enhanced due diligence services; KYC providers; identity verification software; database querying services; regulators and other authorities requiring reporting	UK
Marketing	Marketing campaigns	UK
Job Postings	Job applicant data	UK
Customer Care	CRM, FAQ and content provision	UK

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Appendix A — Summary of DUAA 2025 Changes Incorporated in v1.2

The following table summarises the key changes made to this Privacy Policy as a result of the Data (Use and Access) Act 2025:

Section	Topic	Previous Position	Updated Position
2.4	Legitimate Interests	Standard LIA required for all legitimate interests processing	Recognised legitimate interests introduced. No LIA required for certain activities (fraud prevention, network security, public safety). LIA still required for all other legitimate interests.
3.3	Cookies	Consent required for analytics/functionality/security cookies	Four cookie categories now exempt from prior consent (in force 5 February 2026): analytics, functionality, security, software update cookies. Clear notice and easy opt-out still required. PECR fines raised to £17.5m or 4% global turnover.
5.1	International Transfers	Reference to Privacy Shield (now invalid); adequacy decision framework	Privacy Shield reference removed. New 'data protection test' under DUAA applies. UK-US Data Bridge (October 2023) enables transfers to certified US organisations under the Data Privacy Framework. EU-US DPF survived legal challenge in September 2025.
9.1	Subject Access Requests	No explicit scope standard; no statutory clock-stop	Obligation is to conduct a reasonable and proportionate search. DUAA codifies clock-stop for identity verification and scope clarification requests.

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Section	Topic	Previous Position	Updated Position
9.9	Automated Decision Making	Semi-automated processes with manual review described	ADM framework updated under DUAA: full range of lawful bases permitted; mandatory safeguards confirmed (notice, right to contest, human review). Special category data restrictions remain.
10 (NEW)	Mandatory Complaints Mechanism	No formal mechanism required	DUAA s.164A (in force 19 June 2026) requires a formal complaints process: accessible submission method, 30-day acknowledgement, investigate without undue delay, respond within 3 months, communicate in plain language, inform of escalation rights.
Throughout	ICO/Information Commission	References to 'Information Commissioner's Office (ICO)'	Renamed 'Information Commission' throughout. Enhanced enforcement powers; PECR fines aligned to UK GDPR levels.

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