

Privacy & Cookie Policy

Smartlands Platform Ltd (“We” or “Smartlands Platform”) is the data controller for the purpose of the General Data Protection Regulation (GDPR) (EU) 2016/679. This policy (together with our terms of use <https://platform.smartlands.io/terms-and-conditions.html> and any other documents referred to on <https://platform.smartlands.io> (“our site”) sets out the basis on which any personal data we collect from you, or that you provide to us, 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 site, you are accepting and consenting to the practices described in this policy.

Consent

In specific situations, we can collect and process your data with your consent.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

Legal compliance

If the law requires us to, we may need to collect and process your data.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of the running our business and which does not materially impact your rights, freedom or interests.

Information we may collect from you

We may collect and process the following data about you:

- Information you give us. You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, carry out transactions or make payments through our site, report a problem with our site or carry out any other activities on our site. Smartlands Platform may also gather data about you:
 - When you engage with us on social media.
 - When you enter prize draws or competitions.
 - When you book any kind of appointment with us or book to attend an event.
 - When you choose to complete any surveys we send you.
 - When you comment on or review our products and services.
 - When you've given a third party permission to share with us the information they hold about you.
 - When Smartlands Platform suppliers and partners share information with us.

We collect data from publicly-available sources (such as Land Registry, credit referencing agencies and vote registers) when you have given your consent to share information or where the information is made public as a matter of law in relation towards KYC and AML regulation.

- The information you give us may include your name, address, e-mail address and phone number, financial and credit card information and other personal information.
- Copies of documents you provide to prove your age or identity where the law requires this. (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- We may collect notes from our conversations with you, details of any complaints or comments you make, details of investments you made and how and when you contact us.

- Information we collect about you. With regard to each of your visits to our site we may automatically collect the following information:
- technical information, including the internet protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full uniform resource locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

We use the following cookies:

- Strictly necessary cookies – which are required for the operation of our website, including, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies – which allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This

helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- Functionality cookies – which are used to recognise you when you return to our website, enabling us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies – which record your visit to our website, the pages you have visited and the links you have followed. We use this information to make our website more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Uses made of the information

We use information held about you in the following ways:

- 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;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail) with information about goods and services similar to those which were the subject of a previous sale or negotiations 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.
- to notify you about changes to our service;

- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- to fill contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- to protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest. For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations.
- to process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.

Information we receive from other sources. We may combine this information with 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).

Disclosure of your information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. We provide only the information they need to perform their specific services. They may only use your data for the exact purposes we specify in our contract with them. We work closely with them to ensure that your privacy is respected and protected at all times. If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

We may share your information with selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we or substantially all of its assets are acquired by a third party, in which case personal data held by us about our 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 any agreements between you and us, or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Sharing your data with third parties for their own purposes

We will only do this in very specific circumstances, for example:

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

We may, from time to time, expand, reduce or sell Smartlands Platform and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information please contact our Data Protection Officer by emailing hello@smartlands.io

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff outside the EEA working for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your investment, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received

your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at hello@smartlands.io

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Access to information

GDPR gives you the right to information held about you and information can be accessed in accordance with GDPR by emailing hello@smartlands.io

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to hello@smartlands.io