

# LONDON TECHNOLOGY CLUB LIMITED

## Privacy Policy

Version: 1 February 2024

The website [www.londontechnologyclub.com](http://www.londontechnologyclub.com) (**website**) is provided by London Technology Club Limited (**LTC**, '**we**', '**our**' '**us**'). We are the controller of the personal data obtained via our website, meaning that we are the organisation legally responsible for deciding how and for what purposes that data is used.

We are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, in connection with your use of our website (your **personal data**), will be collected, stored, used and shared 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 [www.londontechnologyclub.com](http://www.londontechnologyclub.com) you accept and consent to the practices described in this policy.

### Applicable law

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**).

### What this policy applies to

This privacy policy relates to your use of our website only. Our website may link to other websites owned and operated by certain trusted third parties to, for instance, make additional products and services available to you. Those third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third-party websites, please consult their privacy policies as appropriate.

### Personal data we may collect about you

The personal data we collect about you depends on the particular activities carried out through our website. We may collect and process the following data about you:

*Information you give us.* For those who wish to register to use our site, subscribe to our services, become a member of the London Technology Club, or participate in discussion boards or other social media functions on our site, the information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph.

For those who wish to sign up and use the LTC investment platform, we will need to collect and process more of your personal information. Based on the specific products and services you select, as well as requirements under applicable law, we may collect the following categories of personal information:

- Your name, address(es), email address(es) and phone number(s);
- As applicable, your bank account information, money transfer instructions, age / date of birth, national identification number, taxpayer ID number, driver's license number or employer ID number;
- Occupation, employment information, income information;
- Citizenship and residency information;
- Financial information with respect to your investment objectives and means, including information about your wealth and financial situation, equity compensation and prior investments;
- Other information to the extent permitted by applicable law and reasonably necessary for the performance of our business obligations, compliance with laws applicable to our business, or pursuit of our legitimate business interests.

You must provide this personal data to us to utilise our membership services and/or investment platform, as the case may be, unless we tell you that you have a choice.

Sometimes you can choose if you want to give us your personal data and let us use it. Where that is the case, we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on your use of our website or any services on it.

We collect and use this personal data for the purposes described in the section entitled 'How and why we use your personal data', below.

*Information we collect about you.* With regards 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, your login information, 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 us.

*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, from time to time. We are also working closely with third parties (including, for example, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) and may receive information about you from them.

## **Cookies and similar technologies**

When you access the website, we and some of our information providers may place cookies, pixel tags, web beacons, page tags, or other data collection and transmission tools or files (collectively, **Cookies**) on your device. These Cookies help us provide you with the best experience, perform analytics, analyse traffic, recognise you as a user, enhance and personalise our products and services, research and improve our offerings, obtain information about your device and software to improve the performance of our website or prevent fraud.

You can manage the use of cookies at the individual browser level, but if you choose to disable cookies, this may limit your use of some of the features or functionality of our website or the LTC investment platform.

## **Uses made of the information**

We will use the information we collect about you for the following key purposes:

- to provide you with networking and investment opportunities in which we believe you may be interested;
- to communicate with you about your use of the LTC investment platform, including to provide support services, activity notifications, and updates and assist you with transactions;
- to undertake due diligence activities, such as KYC and AML checks;
- to facilitate the negotiation and completion of transactions on the LTC investment platform;
- to collect data about and track your usage of the LTC investment platform, so that we can better understand usage patterns and improve our products and services; and
- to meet our legal obligations to monitor for fraud or suspicious activities.

In addition, we use information held about you in the following ways:

*Information you give to us.* We will use this information:

- 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 products or services we feel may interest you. If you are an existing member, we will only contact you by electronic means (e-mail or SMS) with information about products 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 member, 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. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please indicate that preference on the form on which we collect your data (**registration form**);
- to notify you about changes to our service; and
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

*Information we collect about you.* We will use this information:

- 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; and
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

*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). We also collect personal data about you from third parties for the purpose of conducting due diligence activities, such as KYC and AML checks.

## **How and why we use your personal data**

Under data protection law, we can only use your personal data if we have a proper reason, for example:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see 'How to contact us' below).

## **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, as defined in section 1159 of the UK Companies Act 2006.

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 London Technology Club or substantially all of its assets are acquired by a third party, in which case personal data held by it about its 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 to protect the rights, property, or safety of London Technology Club, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We currently use a number of third parties to power LTC's website, including the LTC investment platform, which means that your personal data may be transferred to outside service providers as necessary. If and when we disclose your personal data outside the UK, we will take steps to ensure that the transfer is protected by safeguards provided under UK law. In all cases we make sure that our service providers only process personal data as absolutely necessary to provide the functions we have described.

Except as described herein, we do not share, sell, rent, or trade your information to our service providers or business partners for their own direct marketing purposes, unless we have explicitly given you the option to opt-in or opt-out of such disclosures.

### **Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the UK and the European Economic Area (**EEA**). It may also be processed by staff operating outside the UK and EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, 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.

All information you provide to us is stored on our secure servers. 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 your personal data will be kept**

We will not keep your personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data. Following the end of the relevant retention period, we will delete or anonymise your personal data.

### **Your rights**

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data, in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party, in certain situations
To object to use	The right to object: at any time to your personal data being used for direct marketing (including profiling); and in certain other situations to our continued use of your personal data, for example, where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. We do not make any such decisions based on data collected by our website
The right to withdraw consents	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time. Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

You may also find it helpful to refer to the guidance from the UK's Information Commissioner on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email or call us. Our contact details appear below under the heading '**How to contact us**'. When contacting us please:

- provide enough information to identify yourself and any additional identity information we may reasonably request from you, and

- let us know which right(s) you want to exercise and the information to which your request relates.

In particular, 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 [secretary@londontechnologyclub.com](mailto:secretary@londontechnologyclub.com).

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.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **Access to information**

When technically feasible, we will—at your request—provide your personal data to you. Reasonable access to your personal data will be provided at no cost. If access cannot be provided within a reasonable time frame, we will provide you with a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied.

### **Children's Data**

We do not knowingly collect personal information from minors (under 18 years old) without proper consent from a parent or legal guardian. If you believe that we may have collected personal information from a minor without consent, please contact us and we will investigate the issue.

### **How to complain**

Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have. You also have the right to lodge a complaint with the Information Commissioner in the UK. The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

### **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.

## How to contact us

You can contact us and/or our Data Protection Officer by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details	Our Data Protection Officer's contact details
London Technology Club Ltd 68 Pall Mall, St James's, London, SW1Y 5ES  <a href="mailto:secretary@londontechnologyclub.com">secretary@londontechnologyclub.com</a>	Simon Pavitt 68 Pall Mall, St James's, London, SW1Y 5ES  <a href="mailto:privacy@londontechnologyclub.com">privacy@londontechnologyclub.com</a>