

PRIVACY POLICY

Table of Contents

1 Background	3
2 What information do we Collect?.....	3
3 How do We receive personal information from you?	4
4 How do We use the personal information we collect?	4
5 How we share your personal information?	5
6 Marketing.....	5
7 Accessing and correcting your personal information.....	6
8 Data Retention	7
9 Where is Your personal information is stored?	7
10 Corporate Transaction	7
11 Minors	8
12 Complaints	8
13 Changes to this Privacy Policy.....	8
14 Contact us	8

1 Background

Alhaso Management UK Limited, a company registered in the United Kingdom with company number 10681721 (hereafter referred to as “**Alhaso**”). The company is located at 105 Shirley Church Road, Croydon, England CR0 5AG

Alhaso must comply with the Data Protection Act 2018 and recognises the importance of safeguarding your personal and financial information.

As a company offering information only services, we need to collect, hold and use personal information about you in the course of providing our products and services. This Privacy Policy sets out how we will collect, use and protect your personal information but it does not limit or exclude any of your rights under the Privacy Act.

We may change this policy by uploading a revised policy onto the Alhaso website. Any change will apply from the date that we upload the revised policy.

Alhaso recognises the importance of the protection of personal information. This Privacy Policy (“Policy”) sets out our practices in relation to information that is gathered from persons who visit our website <https://alhaso.co.uk> (“Site”), use of our mobile applications (“Apps”) (both as amended from time-to-time), or otherwise where information that is shared with us and is defined as Personal Information (collectively: “Users”).

2 What information do we Collect?

We collect two types of data and information from Users.

The first type of information is un-identified and non-identifiable information pertaining to a User(s), which may be made available or gathered via your use of the Site (“**Non-Identifiable Information**”).

We are not aware of the identity of a User from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information on your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

The type of **Personal Information** we collect includes:

- **Device Information:** We collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- **Contact information:** If you choose to contact us you will be asked to provide us certain details such as: full name; e-mail or physical address, and other relevant information which the User may provide but will constitute Personal Information.
- **Information provided by you at the time of registering for our service** such as: name; telephone number; email address; residential address; date of birth; nationality; bank account information, other identification details (e.g. passport) and transactional information. This information may also be input by you when reporting a problem with our Website, App, or other service;

Navigation data. The computer systems of the Website collect some Personal Information that is required in the use of Internet communication protocols. This information is not collected to be associated with you, but by its very nature could, through processing and association with data held by third parties, allow you to identify yourself. This data is used to obtain anonymous statistical information on the use of the Website and to check its correct functioning.

3 How do We receive personal information from you?

We receive your Personal Information from various sources:

- When you voluntarily provide us your Personal Information in order to register on our Site or App, or to contact us in some way.;
- When you use or access Our Site or App in connection with your use of our services;
- From third party providers, services, and public registers (for example, traffic analytics vendors).

4 How do We use the personal information we collect?

Any purpose for which we collect and use your personal information is authorised by the Privacy Act.

We will use your personal information:

- Communicating with you – sending you notices regarding our services, providing you with technical information and responding to any customer service issue you may have.
- Conducting statistical and analytical purposes, intended to improve the Site.
- The execution of a contract of which you are a party or to the execution of pre-contractual measures taken on your request (e.g.: the provision of your services)
- To allow the correct delivery of the various features you requested e.g. to carry out your transaction instructions or issue you with a current account.
- To fulfil any obligations required by applicable laws, regulations, or Community legislation, or satisfy requests from authorities.
- To notify you of any change to our service

- To develop new products
- To conduct analysis to track business performance and aid in the operation and protection of the business.
- To ascertain, exercise or defend a right in court or whenever the jurisdictional authorities exercise their jurisdictional duties;
- To allow navigation of the Website and the provision of our services
- To find specific requests addressed to us.

5 How we share your personal information?

In addition to the different uses listed above, we may transfer or disclose Personal Information to our subsidiaries, as well as affiliated companies and subcontractors in relation to services that we provide to you.

We may share Personal Information with our trusted third-party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- Providing the services, we provide.
- Hosting and operating our Site or App
- Performing research, technical diagnostics or analytics

We do not rent, sell, or share Users' information with third parties except as described in this Privacy Policy.

We may also disclose information if we have good faith to believe that disclosure of such information is helpful or reasonably necessary to:

- comply with any applicable law, regulation, legal process, or governmental request;
- enforce our policies (including our Agreement), including investigations of potential violations thereof;
- investigate, detect, prevent, or act regarding illegal activities or other wrongdoing, suspected fraud, or security issues;
- to establish or exercise our rights to defend against legal claims;
- prevent harm to the rights, property or safety of us, our users, yourself or any third party; or

for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights

6 Marketing

We may use your Personal Information, such as your name, email address, telephone number, etc. ourselves or by using our third-party subcontractors for the purpose of providing you with promotional materials, concerning our services, which we believe may interest you. These communications will include:

- To carry out direct marketing via e-mail for services similar to those signed by you, subject to your refusal to receive such communications, which may be expressed during registration or on subsequent occasions by contacting enquiries@alhaso.co.uk
- To carry out marketing activities such as: preparing studies, research, market statistics; send informational and promotional material relating to the activities, services and products quid and our commercial partners (without any communication of Personal Information held by us to the aforementioned Partners)
- Send you surveys to improve the service (“customer satisfaction”). Such communications may be made by e-mail, in-app, or text message, by mail and / or the use of the telephone with operator and / or through the official pages of quid on social networks.
- For statistical purposes, without being able to trace your identity.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important e-mail communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

7 Accessing and correcting your personal information.

Subject to certain grounds for refusal set out in the Privacy Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, contact us by live chat or email us. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

8 Data Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client Personal Information, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion or as requested by you.

9 Where is Your personal information is stored?

Personal Information that is collected from you may be transferred to and stored at a location outside of the European Economic Area (EEA). Staff working for on behalf of Alhaso located outside the EEA may also process your Personal Information. This may be to process your payment or to provide various support services.

Prior to your Personal Information being transmitted outside the EEA, we will ensure that either the destination country is the subject of an EU Adequacy Decision or there are measures in place that are equal to EEA standards to ensure the security of your data.

Whilst we undertake to do our best to ensure your Personal Information is protected, and procedures and features are in place to prevent unauthorised access, any transmission of data to our Website is at your own risk. This is because we are not able to guarantee the security of your data transmitted to our Website as the transmission of data via the Internet is not completely secure.

10 Corporate Transaction

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

11 Minors

We understand the importance of protecting children's privacy, especially in an online environment. The Site is not designed for or directed at children. Under no circumstances shall we allow use of our services by minors without prior consent or authorization by a parent or legal guardian. We do not knowingly collect Personal Information from minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at: enquiries@alhaso.co.uk

12 Complaints

If you have any questions about our Privacy Policy, receive communications purporting to be connected with us that you believe have been sent to you other than in accordance with this Privacy Policy, or would like to complain about a breach of your privacy, please contact us at enquiries@alhaso.co.uk. Our staff are prepared to address any concerns you may have about our handling of personal information. We will take steps to assess and handle your query and complaint within a reasonable period after we receive your request. If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with our data authority, the Information Commissioner's Office (ICO). You can find more details on this via the ICO website at <https://ico.org.uk/make-a-complaint/> or by calling their helpline on +44 (0)303 123 1113.

13 Changes to this Privacy Policy

Alhaso reserves the right to modify or simply update its content, in part or completely, due to changes in the applicable legislation. We will inform you of these changes as soon as they are introduced, and they will be binding as soon as they are published on the Website. Alhaso invites you to visit this section regularly to get to know the most recent Policy.

14 Contact us

Should you wish to make any comments or requests in relation to anything in this Policy, please contact as follows:

- By email at: enquiries@alhaso.co.uk or

Write to the Privacy Officer at: Alhaso Management UK Limited at 105 Shirley Church Road, Croydon,
England, CR0 5AG