

360 Capital Ltd

(the "FSP")

PROTECTION OF PERSONAL INFORMATION AND CUSTOMER PRIVACY NOTICE

Approved by the Board on 11 February 2021

This Notice explains how we collect, retain, use and disclose your personal information, as is required under the Data Protection Act 2017 (“DPA”).

360 Capital Ltd, is committed to protecting clients’ privacy and to ensuring that personal information is collected, retained, used and disclosed properly, lawfully and transparently.

This Notice sets out:

1. Who we are and why do we collect personal information.
2. What information we collect.
3. Our aim to provide ongoing financial and investment management services.
4. To whom we disclose your information.
5. How we safeguard your information.
6. Your rights to access and correction of information.
7. Changes to this Notice.
8. How to contact us.

1. Who we are

360 Capital Ltd is an approved financial services provider with license number GB20025862.

2. What information we collect

- 2.1. We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and to effectively meet your needs for a range of financial and investment services. It is our policy to respect the confidentiality of your personal information.
- 2.2. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information which is adequate, relevant and not excessive for that purpose.
- 2.3. We collect information directly from you where you provide us with your personal details, for example when you invest with us or when you make enquiries or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

3. How we use your information

- 3.1. We will use your personal information only for the purposes for which it was collected or agreed with you, for example to provide our products or services to you. The personal information held

is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products and providing you with ongoing information.

3.2. In providing you with our products and services, we may also use your personal information to:

3.2.1. Service providers and other specialist advisors who have been contracted by us to provide administrative, financial, insurance, investment, research or other services;

3.2.2. Credit reporting or reference agencies; and

3.2.3. Any person or entity authorized by an individual, as specified by that individual or the contact;

3.3. We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.

3.4. We shall not retain your information for any longer than is necessary.

4. Financial Services

4.1. Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other investment and financial products and services which may be of particular interest to you.

4.2. Please email us at info@finsburey.com if you do not want to receive such updates and information. You may opt out at any time if you do not want to receive any further communications of this nature.

5. Disclosure of Information

5.1. We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

5.2. We may share your personal information with, and obtain information about you from:

5.2.1. Third parties for the purposes listed above, for example credit reference and fraud prevention agencies, law enforcement agencies;

5.2.2. Specialist advisors; and

5.2.3. Other third parties from whom you have chosen to receive marketing information.

5.3. We may also disclose your information:

5.3.1. Where we have a duty or a right to disclose in terms of law or industry codes; and

5.3.2. Where we believe it is necessary to protect our rights.

6. Protection of Information

- 6.1. We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.
- 6.2. We aim to safeguard the privacy of your information and we hold personal information in a combination of secure computer storage facilities, paper based files and other records. We have security policies and procedures in place, which cover:
 - 6.2.1. Physical security;
 - 6.2.2. Computer and network security;
 - 6.2.3. Access to personal information;
 - 6.2.4. Secure communications;
 - 6.2.5. Security in contracting out activities or functions;
 - 6.2.6. Retention and disposal of information;
 - 6.2.7. Acceptable usage of personal information;
 - 6.2.8. Governance and regulatory issues;
 - 6.2.9. Monitoring access and usage of private information; and
 - 6.2.10. Investigating and reacting to security incidents.
- 6.3. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.
- 6.4. We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

7. Your Rights:

- 7.1. You have the right to request a copy of the personal information we hold about you. To do this contact us at the numbers/addresses listed below and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.
- 7.2. Please note that any such access request may be subject to a payment of a legally allowable fee.

- 7.3. You have a right at any time, and on reasonable grounds, to object the processing of your personal information, at which time we shall immediately cease doing so.
- 7.4. We endeavor to ensure that the personal information we hold is accurate and up to date. You have the right to ask us to update, correct or delete your personal information. You may do this by contacting us at the numbers/addresses provided below.
- 7.5. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.
- 7.6. We would appreciate it if you would keep your personal information accurate. Please notify us when your information changes.

8. Changes to this Notice

Our Customer Privacy Notice will be reviewed from time to time to take into account current legislation and to ensure it remains appropriate to current circumstances. Please check our website periodically to inform yourself of any changes.

9. How to contact us

If you have questions about this Notice or believe we have not adhered to it or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us by telephone on +230 466-7001.