

MY COMPLIANCE CENTRE

DATA PRIVACY POLICY

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REVISION HISTORY

VERSION	REVISION DATE	SECTION REVISED	REASON FOR REVISION	DESCRIPTION OF REVISION
v1	19/07/2021	All	Update	Comprehensive review
v2	31/01/2022	All	Update	Comprehensive review
v2.1	22/02/2024	All	Update	Annual review

1. INTRODUCTION

Maintaining your privacy is really important to us. You entrust us with sensitive information, and we take that responsibility seriously.

This Privacy Policy explains how we collect, store, and process personal data in the provision of services to our clients and users of our websites. We hope the following sections will answer any questions you have but if not, please do get in touch with us using one of the options in the 'How To Contact Us' section.

We will update our Policy from time to time and will ensure that the latest version of the Policy is always published on our website. This version is dated February 2024.

1.1. About us

My Compliance Centre Limited provides a Regulatory Technology (RegTech) suite of applications to help regulated firms manage their compliance obligations. We are registered with the Information Commissioner's Office under registration number ZA768437.

For simplicity throughout this Policy, 'we' and 'us' means My Compliance Centre Limited (MCC) and its brands.

2. CONTROLLER, PROCESSOR & LEGAL BASES

2.1. MCC Open Websites, Marketing and Office Systems

When you are using My Compliance Centre Open or Banner websites, and communicating with us via email or other means, My Compliance Centre Limited is the data controller. The information in this Policy described how we use your personal data when we act as a data controller only.

2.2. MCC Core Client Applications

When you are using My Compliance Centre core client websites and applications, My Compliance Centre Limited is the data processor. The data controller is the client company or organization which will typically be your employer or agent. You should refer to the relevant data controller's privacy policy to understand how it will use your personal data when you are using our core client website and applications.

2.3. The legal bases we rely on

The law on data protection sets out a number of different lawful bases we can rely on for collecting and processing your personal data, including:

- **Consent:** In specific situations, we collect and process your data with your consent. For example, when you tick a box to receive email newsletters.
- **Legal obligation:** As an organisation we may be required to use your personal data in order to comply with specific legal obligations to which we are subject. For example, we may be required to provide information to the courts or a regulator if ordered to do so.

- **Contractual obligations:** If you have entered into a contract to purchase services from us as a sole trader we will rely on contractual necessity to process your personal data for the purpose of entering into, administering and fulfilling our obligations under the terms of our service contract with you.
- **Legitimate interests:** in specific situations, we require your data to pursue our legitimate business interests in a way which might reasonably be expected as part of running our business. For example, we may rely on our legitimate interests to engage with you as a representative of a company that has entered into a services contract with us. We make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

3. HOW WE COLLECT YOUR PERSONAL DATA

Under UK GDPR personal information is defined as “any information relating to an identified or identifiable natural person”. Personal data, or personal information means any information about an individual, from which that person can be identified. We collect personal data, or personal information, directly from you, for example when you:

- Visit any of our websites, and complete a form;
- Contact us by any means to enquire about us, our services etc.
- Engage with one of our marketing emails or on social media.
- Engage us to provide services to you or an organisation you represent; or
- Subscribe to our services.

Other data controllers (including our clients and third party data aggregators) may also provide your personal data to us.

We may, also, obtain information about you from publicly available sources including from the FCA Register via FCA approved licensees and we collect website usage information using cookies (see “Cookies” section below).

4. THE PERSONAL DATA WE COLLECT

The different types of personal data we may collect about you could include:

- **Identity Data:** includes your title, full name and maiden name if applicable, job role, employer, date of birth, sex, marital status, passport, driving licence data or other identity card;
- **Contact Data:** includes email address, telephone numbers and business address;
- **Financial Data:** includes bank account details (in the case of sole traders) and related information;

- Transaction Data: includes details about payments to and from you and other details of products and services you have purchased from us;
- Usage Data: includes information about how you use our website, products and services;
- Technical Data: includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- Marketing and Communications Data: includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Recruitment Data.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

5. HOW INFORMATION IS USED

We may use your information in the following ways:

Purpose	Data used	Lawful Basis
To provide access and enable you to use our regtech application	Identity Data Contact Data Usage Data Technical Data	Legitimate interests (in delivering our services to your employer or agent) or contractual necessity (in delivering our services to you as a sole trader)
Carry out our obligations arising from our service contracts	Identity Data Contact Data	Legitimate interests (in delivering our services to your employer or agent) or contractual necessity (in delivering our services to you as a sole trader)

To manage and administer our service contracts, including to collect payments due and to notify you of any changes to our terms of service	Identity Data Contact Data Financial Data Transaction Data Usage Data Technical Data	Legitimate interests (in managing our business and collecting monies due to us)
To fulfil our legal and regulatory obligations	Identity Data Contact Data	Legal obligation
Seek your views or comments on the services we provide	Identity Data Contact Data	Legitimate interests (to collect customer feedback on our business and to review and improve our services)
Send you communications which you have requested	Identity Data Contact Data Marketing and Communications Data	Legitimate interests (to respond to queries from our current and potential customers)
For marketing purposes	Identity Data Contact Data Transaction data Marketing and Communications Data	Legitimate interests (to promote and our business and grow our customer base)
To manage and improve our website, services and applications	Identity Data Transaction Data Usage data Technical Data	Legitimate interests (to maintain our business assets and platform)

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 and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

If you wish to change how we use your data, you'll find details in the 'Your Rights' section below. Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

6. USE OF YOUR PERSONAL DATA FOR MARKETING

You will receive marketing communications from us if you have previously requested information about our services, or have purchased our services, on behalf of your Organisation and have not unsubscribed from our marketing communications.

You may also receive marketing communications from us if you are registered as an individual with relevant Senior Management Functions on the FCA's register. We only obtain FCA register data from FCA approved licensees and we regularly screen the FCA data we hold to ensure that your details are removed from our database within two months of you leaving an FCA-registered role.

You may also receive marketing communications from us if you operate in a compliance or risk related role or in a management role with governance responsibilities. We only obtain this information using publicly available data on LinkedIn or other internet sources.

We use a third party data broker to supplement the information that we obtain from the FCA register and LinkedIn. The data broker provides us with a data matching and enrichment service to enable us to identify your professional email address if we only hold your name and employer details.

Our marketing communications are considered business-to-business marketing which is carried out on the basis of our legitimate interests and does not require your consent. However, you can ask us to stop sending you marketing by clicking on the unsubscribe link found at the bottom of all of our marketing communications or by contacting us at any time.

If you have opted out of receiving further marketing communication from us we will retain a copy of your name and email address on our database but flag your record to show that you have opted out. This enables us to ensure that you are not re-added to our database.

We do not sell or share your personal data for third party marketing.

7. RETENTION PERIOD FOR USING YOUR PERSONAL DATA

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. To determine the appropriate retention period for personal data, we consider:

- the amount, nature, and sensitivity of the data;
- the potential risk of harm from unauthorised use or disclosure of the data;
- the purposes for which we process the data; and

- the applicable legal requirements.

Personal data will generally not be held for more than seven years after the end of the relationship/appointment, unless otherwise prescribed by law or regulation.

8. HOW WE SHARE YOUR INFORMATION

We do not sell or distribute your personal data for commercial gain. We may process and share your personal data without your knowledge where this is required or permitted by law.

We may share your personal data with:

- Trusted third party service providers that act as data processors on our behalf, including:
 - Salesforce
- Other data controllers, including:
 - Our auditors, insurers or regulatory bodies
 - Our clients' funders
 - Our mutual clients, whom you have given permission for us to share your data with
 - Third parties to whom we may sell or merge our businesses or assets

All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We work closely with them to ensure that your privacy is respected at all times. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

9. WHERE YOUR DATA MAY BE PROCESSED

Sometimes we will need to share your personal data with firms that provide support services to My Compliance Centre and who are outside the UK. Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Policy. Details of the transfers we make and the safeguards in place are set out below:

Recipient	Location	Safeguards
Microsoft – Azure product	Netherlands	Transfer of personal data to Microsoft is for the data replication of our databases, specifically for the purpose of disaster recovery in the case of the Azure UK South datacentre failing. The transfer of data to Microsoft Azure's Europe West

		region is covered by UK 'adequacy regulations'

This only applies to data for which we are "controller".

10. COOKIES

Like many websites, our website uses cookies. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. The data we collected is aggregated in its nature and is not specific to any one visitor. This helps us to improve our website and deliver a better service. For information about our use of cookies, please view our [Cookies Policy](#).

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result. For further information about cookies visit www.aboutcookies.org or www.allaboutcookies.org.

Our website may contain links to other websites. This Policy only applies to our website so when you link to other websites you should read their privacy policies. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

11. YOUR RIGHTS

Whenever we process personal data we will ensure that we always keep your personal data rights in high regard and take account of these rights. Depending on the circumstances and nature of our processing, under data protection laws you may have the right to:

- **Request access to your personal data (commonly known as a "data subject access request")**. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **Request correction of the personal data that we hold about you**. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- **Request erasure of your personal data**. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to

comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;

- **Object to processing of your personal data.** This applies where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the details set out below.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. YOUR RIGHT TO COMPLAIN

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

13. SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION

When you give us personal information, we take steps to ensure that it's treated securely. Policies and procedures are in place to safeguard it from loss, misuse and improper disclosure. We also have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Any information submitted using website forms is encrypted and protected with 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear at the top of web browsers such as Microsoft Internet Explorer.

14. HOW TO CONTACT US

Please contact us if you have any questions about our Privacy Policy or information we hold about you by using the Contact Form on our website or by writing to:

Ben Mason

Founder and Data Protection Lead

My Compliance Centre Limited

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