

TRADE INFORMATION NETWORK LIMITED

PRIVACY POLICY

v1.0

1. Privacy Policy

- 1.1. This Privacy Policy sets out Trade Information Network Limited (Company No. 12210032), a company incorporated under the laws of England and Wales whose registered office is at 3 More London Riverside, London SE1 2AQ (the **Platform Operator/we/us/our**)’s personal data collection and sharing practices in relation to the Trade Information Network (the **Network**). The Platform Operator is the data controller of your personal data.
- 1.2. In this Privacy Policy, “**Users**” refers to the corporate legal entity that has contracted with the Platform Operator for use of the Network and associated services. In this policy, an “**End User**” or “**you/your**” refers to natural persons that are employees, agents, officers, consultants, contractors and/or subcontractors of the User that use the Network on behalf of the User. It also refers to sole traders that use the Network.
- 1.3. This Policy details our commitment to protecting the privacy of the End Users who use the Network and our associated services.
- 1.4. Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal data. Please check these policies before you submit any personal data to such third party websites.
- 1.5. This Privacy Policy is intended to explain our privacy practices and covers the following areas:
 - 1.5.1. [Personal data we may collect](#)
 - 1.5.2. [Uses of your personal data](#)
 - 1.5.3. [Transmission, storage and security of your personal data](#)
 - 1.5.4. [Your rights & contacting us](#)
 - 1.5.5. [Cookies Policy](#)
 - 1.5.6. [Changes to our Privacy Policy and/or Cookies Policy](#)

2. Personal data we may collect

- 2.1. We may collect and process all or some of the following personal data about you which you may provide directly, or which may be provided from Users and other third parties.
 - 2.1.1. **Contact and biographical information** ► including your name, email address, and other contact details and related information such as details relating to your job role;
 - 2.1.2. **Log-in credentials** ► including your user-name and passwords that enable you to access and use the Network;
 - 2.1.3. **KYC and anti-fraud information** ► information relating to your financial situation, your creditworthiness or any criminal or fraudulent activities provided to us by you or third

parties including information which establishes your identity, such as driving licences, passports and utility bills; information about transactions, credit ratings from credit reference agencies; fraud offences, suspicious transactions, politically exposed person and sanctions lists where your details are included;

- 2.1.4. **Our correspondence** ► if you contact us, we will typically keep a record of that correspondence;
- 2.1.5. **Survey information** ► we may also ask you to complete surveys that we use for research purposes. In such circumstances we shall collect the information provided in the completed survey;
- 2.1.6. **Your usage of the Network** ► details of your usage of the Network (including, where applicable, financial metrics), and our associated services; and
- 2.1.7. **Website and communication usage** ► details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

3. Uses of your personal data

- 3.1. In this section, we set out the purposes for which we use personal data that we collect and, in compliance with our obligations under European and UK law, identify the “legal bases” on which we rely to process the information.
- 3.2. These “legal bases” are set out in European and UK Data Protection Law, which allows companies to process personal data only when the processing is permitted by the specific “legal bases” set out in law (a description of the relevant legal bases can be found at Annex 1 of this Privacy Policy).
- 3.3. Please note that in addition to the disclosures we have identified below, we may disclose personal data for the purposes we explain in this Privacy Policy to service providers, contractors, agents, advisors (e.g. legal, financial, business or other advisors) and our affiliates that perform activities on our behalf, as well as other members of our group
 - 3.3.1. **To generate and manage log-in credentials** ► to enable you to access and use the Network and associate services,
Legal bases: legitimate interests (to enable us to perform our obligations and provide access to the Network and our services to you);
 - 3.3.2. **To conduct our business and ensure the security of the Network** ► to conduct our business including business administration, and to ensure the security of the Network and our associated services.
Legal bases: legitimate interests (to enable us to perform our obligations and provide access to the Network and our **services** to you);

- 3.3.3. **To communicate effectively with you** ► including to respond to your queries and to otherwise **communicate** with you. This includes dealing with any support and maintenance issues for which we are in contact with you.

Legal bases: legitimate interests (to enable us to perform our obligations and provide access to the **Network** and our services to you);

- 3.3.4. **In relation to fraud prevention** ► we and other organisations may also access and use certain information to investigate and prevent fraud as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is **provided** and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.

Legal bases: legal obligations, legitimate interests (to allow us to ensure the legality of the Network and our services). Where this includes Special Categories of Personal Data¹, we rely on **substantial** public interest (prevention or detection of crime), legal claims, or very rarely where necessary, explicit consent;

- 3.3.5. **For research and development purposes** ► to analyse your personal data in order to better understand your and our other Users' services and marketing requirements, to better understand our business and develop our products and services.

Legal bases: **legitimate** interests (to allow us to improve our services);

- 3.3.6. **To monitor certain activities** ► to monitor queries and transactions to ensure service quality, compliance with procedures and to combat fraud.

Legal bases: legal obligations, legitimate interests (to allow us to ensure the legality of the Network and our services). Where this includes Special Categories of Personal Data, we rely **on substantial public** interest (prevention or detection of crime), legal claims, or very rarely where necessary, explicit consent;

- 3.3.7. **To inform you of changes** ► to notify you about changes to our services and products.

Legal bases: **legitimate** interests (to notify you about changes to our service);

- 3.3.8. **To provide you with marketing materials** ► to provide you with updates and offers, where you have chosen to receive these.

Legal bases: consent unless we can rely on legitimate interest (to keep you updated with news in relation to our **products** and services);

- 3.3.9. **To ensure content is relevant** ► to ensure that content, including from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers.

Legal bases: legitimate interests (to allow us to provide you with the content and services on the websites);

¹ "Special Categories of Personal Data" mean personal data which reveals race/ethnic origin; political opinions; religious or similar beliefs; trade union membership; physical or mental health; sex life or sexual orientation; and criminal convictions data.

3.3.10. **To reorganise or make changes to our business** ► in the event that we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation, we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer your personal data to that re-organised entity or third party after the sale or re-organisation for them to use for the same purposes as set out in this policy;

Legal bases: legitimate interests (in order to allow us to change our business); and

3.3.11. **In connection with legal or regulatory obligations** ► We may process your personal data to comply with our regulatory requirements or dialogue with regulators as applicable which may include disclosing your personal data to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

Legal bases: legal obligations, legitimate interests (to cooperate with law enforcement and regulatory authorities). Where this includes Special Categories of Personal Data, we rely on **substantial public interest** (prevention or detection of crime), legal claims, or very rarely where necessary, explicit consent.

4. Transmission, storage and security of your personal data

Security over the internet

- 4.1. No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with data protection legislative requirements.
- 4.2. All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

Export outside the EEA

- 4.3. Your personal data may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the country in which you are located, whose data protection laws may be of a lower standard than those in your country. We will, in all circumstances, safeguard personal data as set out in this Privacy Policy.
- 4.4. Where we transfer personal data from inside the European Economic Area (the EEA) and UK to outside the EEA and UK, we may be required to take specific additional measures to safeguard the relevant personal data. Certain countries outside the EEA and UK have been

approved by the European Commission (and, in the case of the UK, the Information Commissioner's Office) as providing essentially equivalent protections to EEA and UK data protection laws and therefore no additional safeguards are required to export personal data to these jurisdictions. In countries which have not had these approvals (see the full list here http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), we will establish legal grounds justifying such transfer, such as EU Commission-approved model contractual clauses, or other legal grounds permitted by applicable legal requirements.

- 4.5. Please contact us using the contact details set out in the "Contacting Us" section below if you would like to see a copy of the specific safeguards applied to the export of your personal data.

Storage limits

- 4.6. Our retention periods for personal data are based on business needs and legal requirements. We retain personal data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When personal data is no longer needed, we either irreversibly anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

5. Your rights & contacting us

Marketing

- 5.1. You have the right to ask us not to process your personal data for marketing purposes. We will inform you if we intend to use your information 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 not checking certain boxes on the forms we use to collect your personal data. You can also exercise the right at any time by contacting us using the contact details set out in the "Contacting Us" section below.

Updating information

- 5.2. We will use reasonable endeavours to ensure that your personal data is accurate. In order to assist us with this, you should notify us of any changes to the personal data that you have provided to us by contacting us using the contact details set out in the "Contacting Us" section below.

Your rights

- 5.3. If you have any questions in relation to our use of your personal data, you should first contact us using the contact details set out in the "Contacting Us" section below. Under certain conditions, you may have the right to require us to:
 - 5.3.1. provide you with further details on the use we make of your information;
 - 5.3.2. provide you with a copy of information that you have provided to us;
 - 5.3.3. update any inaccuracies in the personal data we hold (please see paragraph 3.2);

- 5.3.4. delete any personal data that we no longer have a lawful basis to use;
 - 5.3.5. transfer your personal data in a structured, commonly used, machine-readable format to an applicable third party in certain circumstances.
- You may also have the right to:
- 5.3.6. where processing is based on consent, to withdraw your consent so that we stop that particular processing (see paragraph 5.1 for marketing);
 - 5.3.7. object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
 - 5.3.8. object to receiving marketing communications from us by contacting us using the contact details set out in the “Contacting Us” section below; and
 - 5.3.9. restrict how we use your information whilst a complaint is being investigated.
- 5.4. Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.
- 5.5. If you are not satisfied with our use of your personal data or our response to any exercise of these rights you have the right to complain to the Information Commissioner’s Office. The contact details are below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Email: casework@ico.org.uk
Telephone: 0303 123 1113

Contacting us

- 5.6. If you have any questions in relation to this policy, please contact us at the address indicated above or using the contact details set out on our website or in the Network.

6. Cookies policy

- 6.1. We may use cookies on the websites. To find out more about how we use cookies, please see our Cookies Policy available on our website.

7. Changes to our Privacy Policy and/or Cookies Policy

- 7.1. We may change the content of our websites and how we use cookies and consequently our Privacy Policy and our Cookie Policy may change from time to time in the future. If we change this Privacy Policy or our Cookies Policy, we will update the date it was last changed below. If these changes are material, we will indicate this clearly on our website.
- 7.2. This Privacy Policy was last updated in August 2020.

Annex 1 : Details of lawful bases

The main lawful bases for our use of personal data, as referred to in our Privacy Policy, are as follow:

- **Legal obligation:** where we need to use your personal data to comply with our legal obligations.
- **Legitimate interests:** where we have a legitimate interest in using your personal data. We will only rely on this lawful basis if we consider that our interest in using your personal data for the relevant purpose is not outweighed by any interests that you may have, or any prejudice that you may suffer, from the relevant use of your personal data.
- **Consent:** where you have consented to our use of your personal data. You may withdraw your consent to the use of your personal data by contacting us using the contact details set out in the “Contacting Us” section above. If you do, we may be unable to provide a service that requires the use of such personal data.

The main lawful bases for our use of your Special Categories of Personal Data are as follows:

- **Legal claims:** where your personal data is necessary for us to establish, exercise or defend any legal claims.
- **Substantial public interest:** where we need to process your personal data for reasons of substantial public interest set out in UK law.
- **Explicit consent:** where you have given your explicit consent to the processing of those personal data for one or more specified purposes. You may withdraw your consent to the use of your personal data by contacting us using the contact details set out in the “Contacting Us” section above. If you do, we may be unable to provide a service that requires the use of such personal data.