

## **Privacy Policy**

**Updated and Effective Date: 1 January 2020** 

## THIS PRIVACY POLICY APPLIES TO OUR WEBSITES AND PLATFORMS.

This Privacy Policy will set out the data processing practices that relate to personal information and data which has been collected, stored and retained via the use of this Website and also all other electronic communications by Qorbis Group Holdings.

The EU General Data Protection Regulation (GDPR) 2016/679 takes effect on 25th May 2018. Qorbis Group Holdings will adhere to GDPR regulations as applicable as a data controller and data processor.

Your privacy is of great importance to us. This privacy policy describes out how Qorbis Group Holdings uses and safeguards any information that you give us when using this website. We endeavour to strike a reasonable balance between your personal privacy whilst ensuring that you get full market value from the internet and the different services and products we may market to you.

We are totally committed to making sure that you have protection in terms of privacy. When asking you to provide certain information with which can be used for identification purposes when using this website, you can be reassured that it will only be used in conjunction with this policy statement.

We might change the policy on occasion by updating this page. You are advised to check this page on occasion to make sure that you are happy with anything that changes. This policy will take effect from 25 May 2018.

If you do have any requests about your personal information or any questions with regard to these practices feel free to contact Qorbis Group Holdings at <a href="mailto:enquiries@aghl.co.uk">enquiries@aghl.co.uk</a>

"Personal Data" is Data regarding any identifiable person in so far as this regarding a Client. It means any information relating to someone identified or an identifiable natural person ('data subject'); an identifiable natural person is someone who is able be identified, directly or indirectly, by particular reference to an identifier, for example a name, an identification number, an online identifier, location data or to one or more factors specifically associated to the physical, genetic, physiological, mental, cultural, economic or social identity of that natural individual.

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## Information collected

Acting as a Controller, Joint-Controller or Processor, Qorbis Group Holdings collects personal information people who visit the Website via the using online forms, By obtaining from your product or service provider, if you decide to invest via our services, obtained from a different entity where Qorbis Group Holdings provides administration services, each time you email details to us. When we act as a Controller, Joint-Controller or as an agent of other entity who is a Controller of your Data we might gather information about you and then process it; this information might include:

- your name,
- your postal address,
- your email address,
- your telephone number,
- your bank account details,
- your date of birth,
- your wallet ID on our FCA-regulated payment service provider, MangoPay,
- a copy of proof of identity, such as passport or similar document,
- information about investments you have made with Qorbis Group Holdings, such as the amount invested, the product acquired, etc.

If you act on behalf of a company, we might collect, for example:

- Certificate of Incorporation,
- Memorandum and Articles of Association,
- copy of proof of identity (such as passport or similar document) for its shareholders and directors,
- Managerial and administrative contact information (email and phone number).
- Use of personal information

Qorbis Group Holdings is in control of and/or processes personal information for the purposes such as:

- To comply with our regulatory and legal obligations, we might use your personal data (and if you do not give us this personal data, we might not be able to provide you with our services):
- To conduct necessary anti-money laundering checks, and the financial crime and fraud monitoring checks associated, in connection with transactions you might be involved in via the Website, in terms of investors, to confirm that you are suitable to make investments via the Website according with relevant legislation, to allow us to comply with our responsibilities as a regulated financial services business, which includes transaction recording, updates on your investment and fundraising on the Website, as well as other compliance responsibilities, and providing reports to regulators and governmental authorities.



- To carry out our obligations under our contracts with you or others, we may use your personal data:
- For the processing and administering of payments and investments that relate to the services offered on the Website,
- To approve the process of seeking capital for entrepreneurs from the potential investors,
- to facilitate investment transactions,
- For the creation of and maintenance of a register of Clients and investments
- We have a legitimate interest in ensuring that the Website and our services operate effectively, and to do this we may use personal data:
- to provide our services (which may include the detection, prevention of security and technical issues), and to monitor, improve and administer the Website,
- to respond to customer support requests and enquiries, and to ensure customer satisfaction, administering orders and any accounting that is related to our Clients,
- to maintain information as a reference tool or more general resource,
- to manage Clients' accounts with our payment services provider PYXPRO, this includes the payments made to third parties from an account upon Clients' instructions,
- to provide information to you about products and services,
- to provide administrative and software support for product providers with whom you've invested with or for other entities assisting them with this process.

Your Personal Data may be profiled in kind of automated processing.

We employ others and companies to service our Clients and may need to share information with them to provide products, information or services to individual Clients. In all cases where we share said information with such agents, we specifically require the agent to acknowledge and adhere to our Privacy Policy.