

## PRIVACY POLICY

*Last updated November 21, 2022*

This privacy policy for Wealthyhood Ltd (doing business as Wealthyhood) (“**Wealthyhood**”, “**we**”, “**us**”, or “**our**”), describes how and why we might collect, store, use, and/or share (“**process**”) your information when you use our services (“**Services**”), such as when you:

- Visit our website at wealthyhood.com, or any website of ours that links to this privacy policy
- Download and use our mobile application (Wealthyhood Invest) or any other application of ours that links to this privacy policy
- Engage with us in other related ways, including any sales, marketing, or events

**Questions or concerns?** Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com).

### 0. SUMMARY OF KEY POINTS

**This summary provides key points from our privacy policy, but you can find out more details about any of these topics below.**

#### **What personal information do we process?**

When you visit, use, or navigate our Services, we process personal information depending on how you interact with Wealthyhood and the Services, the choices you make, and the products and features you use.

#### **Do we process any sensitive personal information?**

We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

#### **How do we process your information?**

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

## How do we keep your information safe?

We have all the organisational and technical processes and procedures in place to protect your personal information. However, please keep in mind that no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure.

## What are your rights?

Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

## How do you exercise your rights?

The easiest way to exercise your rights is by contacting us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com). We will consider and act upon any request in accordance with applicable data protection laws.

## 1. WHAT INFORMATION DO WE COLLECT?

### 1.1 Personal information you disclose to us

**In Short:** We collect personal information that you provide to us.

We collect personal information that you provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- mailing addresses
- billing addresses

**Sensitive Information.** When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- social security numbers or other government identifiers

**Application Data.** If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- Mobile Device Data. We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model, Internet service provider and/or mobile carrier, and Internet Protocol (IP) address or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.
- Push Notifications. We will request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

## **1.2 Information automatically collected**

***In Short:*** Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our [Cookie Policy](#).

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:*** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and comply with the law. We may also process your information for other purposes with your consent.

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- **To facilitate account creation and authentication and otherwise manage user accounts.** We process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate the delivery of services to the user.** We process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We process your information to send you details about our products and services, changes to our terms and policies, and other similar information.

- **To fulfil and manage your orders.** We process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- **To meet regulatory requirements including the detection of fraudulent activities.**

### 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

**In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We process your personal information to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

### 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

**In Short:** We may share information in specific situations described in this section and/or with the following categories of third parties.

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information.

This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

The categories of third parties we may share personal information with are as follows:

- Order Fulfilment Service Providers
- Payment Processors
- User Account Registration & Authentication Services

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Business Partners.** We may share your information with our business partners in order to allow us to offer our products and services to you.

## 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

**In Short:** We use cookies and other tracking technologies to collect and store your information.

We use cookies and similar tracking technologies (like pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookie Policy](#).

## 6. HOW LONG DO WE KEEP YOUR INFORMATION?

**In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 7. HOW DO WE KEEP YOUR INFORMATION SAFE?

**In Short:** We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure.

Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 8. DO WE COLLECT INFORMATION FROM MINORS?

**In Short:** We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

**In Short:** In some regions, such as the United Kingdom (UK) and the European Economic Area (EEA), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the UK and the EEA), you have certain rights under applicable data protection laws. These may include the right:

- i. to request access and obtain a copy of your personal information;
- ii. to request rectification;
- iii. to request erasure of your data;
- iv. to restrict the processing of your personal information; and
- v. if applicable, to data portability.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com).

We will consider and act upon any request in accordance with applicable data protection laws.

**Withdrawing your consent:** If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com).

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**Opting out of marketing and promotional communications:** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com). You will then be removed from the marketing lists. However, we may still communicate with you – for example, to send you service – related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

**Account Information:** If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com).

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

For further information, please see our [Cookie Policy](#).

If you have questions or comments about your privacy rights, you may email us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com).



## **10. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised.

As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

## **11. DO WE MAKE UPDATES TO THIS NOTICE?**

***In Short:*** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may email us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com) or by post to:

Wealthyhood Ltd  
Suite 3 Grapes House, 79a High Street  
Esher  
KT10 9QA  
United Kingdom

## **13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please contact us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com).

#### **14. HOW TO COMPLAIN**

If you have any concerns about our use of your personal information, you can make a complaint to us at [hello@wealthyhood.com](mailto:hello@wealthyhood.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>