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## PRIVACY AND COOKIES POLICY

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### BACKGROUND:

Solia Investments Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who has access to our exclusive project dashboard on the Co-Funding Investor Automation Platform which can be found at, [solia.co-funding.co.uk](https://solia.co-funding.co.uk) ("**The Platform**") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your continued use of The Platform confirms your acceptance of this Privacy Policy.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>"Account"</b>	means an account required to access and/or use certain areas and features on The Platform;
<b>"Cookie"</b>	means a small text file placed on your computer or device by The Platform when you visit certain parts of The Platform and/or when you use certain features of The Platform. Details of the Cookies used by The Platform are set out in Part 14, below;
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended into equivalent UK domestic law);
<b>"The Platform"</b>	means our exclusive project dashboard on the Co-Funding Investor Automation Platform
<b>Third Party Processors</b>	means the platform provider, the e-money services provider and the AML/KYC checking service provider as particularised at Part 10.

### 2. Information About Us

We are Solia Investments Limited, a limited company registered in England under company number 11719270.

The Co-Funding Investor Automation Platform is owned by Co-Funding which is a trading style of In5pire Group Ltd, a limited company registered in England under company number 11639392 who operate The Platform for functional support, maintenance and system update purposes only. You may wish to review their privacy policy which can be found at: [marketing.co-funding.co.uk/privacy](https://marketing.co-funding.co.uk/privacy).

Your personal data is collected, used and controlled by us in order to allow us to offer you with investment projects and manage your account and relationship with us. The Platform is therefore operated by us and your personal data is processed by various Third Party Processors.

Our Data Protection Officer can be contacted at [dpo@soliainvestments.co.uk](mailto:dpo@soliainvestments.co.uk).

3. **What Does This Policy Cover?**

This Privacy Policy applies to your use of The Platform in so far as providing your personal data to us in order to provide you with access to review our investment projects and the ability to make and manage your investments.

4. **What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as

outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of The Platform, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies.

Data Collected	How We Collect the Data
<u>Identity Information</u> including: <ul style="list-style-type: none"><li>• Name</li><li>• Title</li><li>• Date of birth</li><li>• Nationality</li><li>• Passport contents</li><li>• Driving License contents</li></ul>	Provided by you when you submit the details to us through The Platform to operate and manage your Account
<u>Contact information</u> including: <ul style="list-style-type: none"><li>• Address</li><li>• Email address</li><li>• Telephone number</li></ul>	Provided by you when you submit the details to us through The Platform to operate and manage your Account
<u>Profile information</u> including: <ul style="list-style-type: none"><li>• Login details</li></ul>	Provided by you when you submit the details on The Platform to create your Account
<u>Payment information</u> including: <ul style="list-style-type: none"><li>• Bank account details (sort code and account number)</li></ul>	Provided by you when you submit the details to us through The Platform to operate and manage your Account
<u>Technical information</u> including: <ul style="list-style-type: none"><li>• IP address</li><li>• IP location</li><li>• Browser type</li><li>• Operating system</li></ul>	Provided by your computer when you use The Platform
<u>Data from third parties</u> including: <ul style="list-style-type: none"><li>• KYC / AML report which may contain justification for any failed checks (e.g. politically exposed persons)</li></ul>	Provided electronically by third parties including MangoPay SA and Sum And Substance Ltd (UK)

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful basis for doing so:

What We Do	What Data We Use	Our Lawful Basis
Allowing you access to The Platform.	<ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact information</li> <li>• Profile information</li> <li>• Payment information</li> <li>• Technical information</li> <li>• Data from third parties</li> </ul>	<ul style="list-style-type: none"> <li>• To perform a contract with you, or</li> <li>• Where we have legitimate interests to process the personal data and they're not overridden by your rights, or</li> <li>• Where we have your consent.</li> </ul>
Operating your Account.		
Offer you with projects to review.		
Enter into loan agreements with you.		
Communicating with you.		
Operating and reviewing your e-money account with a third party provider means we will share the required personal data with that provider.	<ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact information</li> <li>• Payment information</li> </ul>	<ul style="list-style-type: none"> <li>• To perform a contract with you, or</li> <li>• Where we have your consent.</li> </ul>
Conducting and reviewing your KYC/AML check with a third party provider means we will share the required personal data with that provider.	<ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact information</li> <li>• Payment information</li> </ul>	<ul style="list-style-type: none"> <li>• To perform a contract with you, or</li> <li>• Where we have legitimate interests to process the personal data and they're not overridden by your rights, or</li> <li>• In accordance with a legal obligation, or</li> <li>• Where we have your consent.</li> </ul>

You will not be sent any unlawful marketing or spam by us. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended into equivalent UK domestic law), and you will always have the opportunity to opt-out.

Third parties (including Co-Funding (In5pire Group Ltd), MangoPay SA and Sum And Substance Ltd (UK)) whose content appears on The Platform may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that whilst the third parties may be our Third Party Processors and so we have some control over their processing activities, we do not control all of the activities of such third parties such as the third-party Cookies and therefore we advise you to check the privacy policies of any such third parties in addition to this policy.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity information	The period of time we keep your personal data depends on whether we have an ongoing requirement or need to retain it (for example, to enable you to use your Account to access the Platform so as to make and manage your investments or to comply with applicable legal requirements).  We will retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing requirement or need to retain it (for example, to comply with applicable legal requirements or the terms of any loan agreement which we may have with you)  Following that period, we'll make sure it's deleted or anonymised.
Contact information	
Profile information	
Payment information	
Technical information	
Data from third parties	Data from third parties will only be retained by us in accordance with the instructions provided by the third parties or by you, subject to compliance with any applicable legal requirements.

## 9. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein.

This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so; and
- ensuring our security systems are regularly updated to combat against malware and other unwanted defects.

#### 10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We utilise the services of third parties in order to provide administration of The Platform, AML/KYC checks and payment processes.

Recipient	Activity Carried Out	Location
Co-Funding (In5pire Group Ltd)	Provides functional support, maintenance and system updates to The Platform.	UK
MangoPay SA	Provides payment processes within The Platform.	Luxembourg (EU)
Sum And Substance Ltd (UK)	Provides AML/KYC checking processes within The Platform.	UK

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

#### 11. **How Can I Control My Personal Data?**

In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via The Platform, at times, you may be given options to restrict our use of your personal data.

**12. Can I Withhold Information?**

You will not be able to access The Platform if you do not provide the required personal data as this is needed in order to carry out certain checks before you can view and invest in projects.

You may restrict our use of Cookies. For more information, see Part 14.

**13. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**14. How Do You Use Cookies?**

Currently, we do not use any first-party Cookies. Where in the future we use any additional first-party Cookies, our privacy policy will be updated to inform you. Where we use additional Cookies in the future, this will be to facilitate and improve your experience of The Platform and to provide and improve The Platform. We will ensure we always carefully choose Cookies and will take steps to ensure that your privacy and personal data is protected and respected at all times.

By using The Platform, you may receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies may be used on The Platform by Third Party Processors. For more details, please refer to their privacy policies.

All Cookies used by and on The Platform, are and will be, used in accordance with current Cookie Law.

Before any new first-party Cookies are placed on your computer or device, you will be shown a prompt requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of The Platform may not function fully or as intended.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access The Platform more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

**15. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the Data Protection Officer):

Email address: [dpo@soliainvestments.co.uk](mailto:dpo@soliainvestments.co.uk)

**16. Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on The Platform and you will be deemed to have accepted the terms of the Privacy Policy on your first use of The Platform following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated on 01.08.2020