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1. Introduction

TradeCore Group Limited (collectively referred to as "TradeCore", "we", "us" or "our" in this privacy policy) respects your privacy and is committed to protecting your personal data. We take data security seriously and we make sure we have appropriate security measures in place to prevent your personal data from being accidentally lost and from unauthorised use and access. Please read this Privacy Policy carefully as it explains our practices regarding your personal data and how we will treat it. This privacy (together with our Cookie Policy) policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how TradeCore collects and processes your personal data through your use of this website, including any data you may provide through this website when you use it. This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

TradeCore Group Limited is the controller and responsible for your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

Full name of legal entity: TradeCore Group Limited

Company number: 8439612 (England and Wales)

Data Protection Officer email address: compliance@tradecore.com

Postal address: 1 Byrom Place, Manchester, England, M3 3HG, United Kingdom

Our data controller registration number is ZA025076. You can check our registration on the Data Protection Public Register by visiting <https://www.ico.org.uk/esdwebpages/search>.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.



Changes to the privacy policy

We keep our privacy policy under regular review.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3. The data we collect about you

We may collect and process the following personal data about you:

Information you give us. You may give us information about you when you register with our website <https://www.tradecore.com> (“our website”) or by communicating with us by phone, email or otherwise. This also includes information you provide when you subscribe to our services, provide us with feedback, participate in surveys, and when you report a problem with our website. The information you give us may include your name, address, email address, phone number, date of birth, identity documents, username (or similar identifier), job title and company information. If you engage with us through social media then this may also include your social media contact details, such as your LinkedIn address or Twitter username.

Information we collect about you when you communicate with us by phone, email, post, in person or otherwise, and when you use our services. We collect engagement metric information such as information about how, when and how often you contacted us, and how, when and how often you responded to communications from us and about how and when you use our services.

Information we collect about you if you use our website or interact with us over the internet, including via social media. Each time you visit our website or interact with us we may automatically collect the following information: (a) technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; (b) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Information we collect about you from publicly available sources. This may include information available from social media (depending on your settings and the applicable privacy policies), including social media engagement metrics such as numbers of connections, followers and clicks, and information from resources such as Companies House.

Information we receive from other sources. We may receive further information about you if you use any of the services we provide. We work closely with third parties (including, for example, business partners, service providers, identity verification providers, analytics providers such as Google, advertising networks search information providers) and may receive information about you from them. We may

combine information we receive from these other sources with information you give to us and information we collect about you.

We may monitor or record telephone conversations or other communications between you and us and keep recordings or transcripts of them and, if you contact us, we may keep a record or copy of that correspondence.

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from your personal data, but it is not considered personal data under the Data Protection Legislation as it does not directly or indirectly identify you. If at any time we do combine any aggregated data with your personal data so that it can identify you, we treat the combined data as personal data, which we will use and process in accordance with this Privacy Policy.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to complete a survey	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications 	Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications Technical 	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> a) Technical b) Usage 	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing and Communications 	Necessary for our legitimate interests (to develop our services and grow our business)

Direct marketing

Where we have your consent we may send direct marketing communications to you, including by email, telephone or SMS or mail.

Whenever you receive direct marketing from us you will be told how you can unsubscribe so that you no longer receive it. When we communicate with you via email you will also be given the opportunity to set or amend any preferences that you have indicated to us.

You are also able at any time to withdraw any consent to receive marketing communications that you have given to us. You can do this by contacting us at compliance@tradecore.com.

Please provide us with your full name, address and other contact details to enable us to find your records. Sometimes we may also need to contact you further to ask you for additional information so that we can comply with your request.

Third-party marketing

We will request your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

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. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the Glossary below.
- External Third Parties as set out in the Glossary below.
- Fraud prevention agencies, to prevent crime and trace those responsible;
- Identity verification providers, to comply with legal or regulatory requirements;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website;
- IT and software providers who supply us with our IT infrastructure for the provision of our services and administering our business (including our internal and external communications) and who also help us manage our customer and contact databases, customer relationships and marketing.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- Any other business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We review all our relationships with third parties carefully so that we can be sure as possible that their practices match our own commitments to you relating to privacy and security. We also comply with the United Kingdom Data Protection Act 2018 in our dealings with these third parties to ensure that your information is appropriately protected.

4. International transfers

We share your personal data within the TradeCore group of companies. This will involve transferring your data outside the European Economic Area (EEA). We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules".

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by using Standard Contractual Clauses ("SCC") approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place 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.

6. Data retention

How long will you keep my personal data for?

How long we keep your information will depend on the purpose for which we use it and so may vary. We will only retain your information for as long as is necessary for the purposes set out in this Privacy Policy and as is necessary to comply with our legal obligations. We do not keep more information than we need for the particular purpose.

Where we have provided you with a service we will keep an archived record of your personal data for a period of up to 5 years after termination (unless a longer period is prescribed by law) for the purposes of responding to legal disputes and legal or regulatory enquiries or investigations only, but will not use this data for any other purpose.

In order to ensure that we provide reliable and effective services, and to comply with our regulatory obligations, we regularly make back-up copies of our data. If we have provided any services to you then this will include your personal data. Where we delete your personal data from our systems, for whatever reason, a copy may be retained in our data back-ups for a period of up to 90 days afterwards. These are kept securely and only accessed in order to delete old versions or in the event of an emergency which means we have to utilise a back-up copy to reinstate data on our active systems. Where we have to do this, we will work to ensure as soon as we reasonably can that the copy of the data that has been used to reinstate data on our active systems is updated to take account of any previous amendments and deletions regarding your personal data.

If you ask us to stop sending direct marketing communications to you (see section 3, above), we will keep the minimum amount of information necessary (such as your name and email address) to ensure that we are able to adhere to your request. We also routinely seek to minimise the amount of personal data we hold where any marketing contact is deemed inactive. We deem a contact to be inactive if we have not been able to identify any engagement (e.g. through opening an email or visiting our website) for a period of 12 months or if an email is not delivered due to a hard bounce. In such circumstances we will anonymise all relevant data for aggregation purposes, with the exception of an email address. This does not affect your rights as set out in section 7 of this Privacy Policy.

7. Your legal rights

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 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.

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 services to you. We will advise you if this is the case at the time you withdraw your consent.

These rights are limited in some situations. For example, if we have a legal requirement or a compelling legitimate ground, we may continue to process your data even where you request its deletion.

If you would like to exercise any of these rights, please contact us using the details in the Contact section below.

You also have the right to make a complaint if you feel your personal data has been mishandled. We would encourage you to contact us in the first instance but you are also entitled to complain directly to the Information Commissioner's Office (ICO) (if you are in the UK), or to your local data protection authority (if you are outside the UK).

No fee usually required

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.

Time limit to respond

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.

8. Glossary

Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights

before we process your personal data for our legitimate interests. We do 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Third parties

Internal parties

Other companies in the TradeCore Group and who are based in the United Kingdom and provide IT and system administration services and undertake leadership reporting.

External third parties

- Service providers acting as processors based who provide identity verification, IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers and auditors who provide consultancy, banking, legal and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based who require reporting of processing activities in certain circumstances.