

# Privacy Notice Together

June 2021

This privacy notice explains how your personal data is processed when you (“**you**”, “**your**”) use our website or other services.

## Controller of your personal data

Together Finance B.V. (“Together”) is the controller of the personal data collected through its website and its services. Together is located at Kabelweg 57, 1014 BA, Amsterdam, The Netherlands.

Where you, your employer or your client are part of our services which require “know your customer checks” or support in our CREST software solution, such activities are performed by our parent company Channel Capital Advisors LLP (“Channel”) established in London, United Kingdom. For such processing activities, Together and Channel are joint controllers and have concluded a joint controller agreement. Core of this agreement is that Channel is the main contact point for all privacy and data protection related matters of personal data collected through these services. Please see the ‘Contact Us’ page for contact details of Channel.

The term “Together”, “we” or “us” in this privacy notice means Together Finance B.V. jointly with Channel Capital Advisors LLP for all “know your customer checks” and CREST services. For all other processing activities, the term “Together”, “we” or “us” means Together Finance B.V.

## 1. Who does this privacy notice apply to?

This notice applies to:

- our website users;
- our clients, investors, suppliers and business partners; and
- persons who interact with us, when you call us or email us.

This notice applies to you whether you act in your personal capacity or as employee or agent of an organisation.

## 2. What types of information do we collect?

Generally, “**personal data**” means any information relating to an identified or identifiable natural person; such person is known as a ‘**data subject**’. In practice, almost all information relating to you will be your personal data.

We will process the following personal data about you:

- Your **contact details** such as your name, telephone number and email address but also your role, employer details and similar information.
- When you contact or visit us, we may process the details of your enquiry, job application, communication, complaint or other **interaction information**.
- We may keep a note about our interaction with you, certain “know your customer” or anti-money laundering information, your client instructions and other **relationship management data**.
- Information that we collect about your **preferences and interests** known, observed or inferred which we use for personalisation and direct marketing.

- **Third party data about you** such as information from our background checking suppliers, your interaction with our posts and content and ‘likes’ on social media platforms, such as Twitter, LinkedIn and Facebook profile information, preferences and interests from advertising and analytics partners, and other third parties.
- When we send you emails or other communications, we may collect **engagement information**, such as open rates and whether you clicked on any content.
- When you **visit our offices**, we record information about your arrival (name / registration number) in advance.

Much of the personal data is provided by you or automatically by your device. You can adjust your device privacy settings to limit disclosure of your personal data that is not necessary for our services.

However, most information will be necessary to assist you or to provide our services and some personal data will be mandatory for our compliance with the law. Nevertheless, we would ask that you only provide the necessary personal data to us.

### 3. Data accuracy

We will rely on the information provided by you as accurate, complete and up to date, and we would be grateful if you could inform us of any changes.

### 4. What information do we collect and why?

Generally, we will use your personal data to (i) provide and enable you to use our services, (ii) respond to your queries, (iii) develop and promote our organisation and services; (iv) ensure the security and technical availability of our services; and (v) comply with the law.

Purpose	Personal data	Legal ground for processing* (for individuals in the EEA and UK only)
To <b>assist</b> and contact you in relation to <b>your enquiry</b> .	<ul style="list-style-type: none"> <li>• contact details</li> <li>• interaction information</li> </ul>	Necessary for our <b>legitimate interest</b> in responding to queries, maintaining business relationships and administering our business or to take <b>necessary steps</b> at your request prior to entering into a contract with you.
To <b>manage our relationship</b> with you, carry out anti-money laundering and “know your customer checks”, using communications, management and engagement tools.	<ul style="list-style-type: none"> <li>• contact details</li> <li>• relationship management data</li> <li>• preferences and interests</li> <li>• engagement information</li> </ul>	Necessary for our <b>legitimate interest</b> in understanding and maintaining our business relationships and administering our business.
To <b>provide</b> our <b>services</b> to you, such as our website, advisory services, asset management, programme management and other services.	<ul style="list-style-type: none"> <li>• contact details</li> <li>• device &amp; browser data</li> <li>• usage data</li> <li>• engagement information</li> <li>• relationship management data</li> </ul>	Necessary for the <b>performance of our contract</b> with you and for our <b>legitimate interest</b> in providing our services.
To fulfil your requests, send you information which you have requested about our services and send you <b>service communications</b> about matters relevant to your use of our services and your engagement with us, such as client communications, relevant content, details of events, surveys, billing, changes in our terms, etc.	<ul style="list-style-type: none"> <li>• contact details</li> <li>• preferences and interests</li> <li>• device &amp; browser data</li> <li>• usage data</li> </ul>	Service communications are necessary for the <b>performance of our contract</b> with you. Other notifications are necessary for our <b>legitimate interest</b> in satisfying your requests, facilitating our services and organising related business activities.

Purpose	Personal data	Legal ground for processing* (for individuals in the EEA and UK only)
<p>To <b>send you our newsletter</b> and promotional information through various marketing channels including <b>email, social media, telephone, SMS</b>, etc. about our services and our organisation, <b>reviewing and optimising campaign performance</b> and <b>profiling information</b> about your interests known, observed or inferred for <b>direct marketing purposes</b>.</p> <p>For example, we may use your contact details to display <b>relevant ads</b> through <b>Google, Twitter or LinkedIn</b> or other social media platforms. Social media and advertising providers may use their own information about you to help us make our ads most relevant.</p>	<ul style="list-style-type: none"> <li>● engagement information</li> <li>● relationship management data</li> <li>● contact details</li> <li>● interaction information</li> <li>● preferences and interests</li> <li>● device &amp; browser data</li> <li>● usage data</li> <li>● engagement information</li> <li>● third party data</li> </ul>	<p>Some of our direct marketing activities are necessary for our <b>legitimate interest</b> in understanding your interests from the information available to us, information observed or inferred and third party information, in promoting our business and understanding campaign metrics.</p> <p>We will obtain your <b>consent</b> where required by law. For example, your consent will be required to place <b>cookies or similar technologies</b> on your device or to read information on your device.</p>
<p>To <b>improve and develop our services</b>, including to:</p> <ul style="list-style-type: none"> <li>● obtain feedback;</li> <li>● use Google Analytics to understand the demographics of our users;</li> <li>● conduct statistical analysis;</li> <li>● make services and features more relevant;</li> <li>● improve user experience;</li> <li>● work with third parties and evaluate data to improve and develop our services.</li> </ul>	<ul style="list-style-type: none"> <li>● interaction information</li> <li>● usage data</li> <li>● device &amp; browser data</li> <li>● aggregated data</li> <li>● third party data</li> </ul>	<p>Necessary for our <b>legitimate interest</b> in delivering our services properly, efficiently and understanding our customer's needs and expectations.</p> <p>We will use cookies and similar technologies if you provided your <b>consent</b>. Read more in our <a href="#">cookie policy</a> [hyperlink].</p>
<p>To ensure proper <b>administration of our business</b>, including to:</p> <ul style="list-style-type: none"> <li>● keep appropriate records about how our services are used;</li> <li>● resolve complaints;</li> <li>● conduct troubleshooting;</li> <li>● manage our business relationships and identify opportunities;</li> <li>● register interactions with our communications, such as emails;</li> <li>● enforce our terms; and</li> <li>● debt collection.</li> </ul>	<ul style="list-style-type: none"> <li>● contact details</li> <li>● interaction information</li> <li>● relationship management data</li> <li>● aggregated data</li> </ul>	<p>Necessary for our <b>legitimate interest</b> in the proper administration of our business, dispute resolution, ensuring technical operation of our services and debt collection and necessary for compliance with a <b>legal obligation</b> to which we are subject.</p>
<p>To engage our <b>third party advisers</b> and <b>service providers</b> who may process your information on our behalf to facilitate the provision of our services and the fulfilment of essential service functions, such as web hosting, cloud storage, analytics, payments, plugins, communications, accounting, security and others.</p>	<ul style="list-style-type: none"> <li>● all information necessary to enable the relevant service</li> </ul>	<p>Some activities are necessary for the <b>performance of our contract</b> with you, others are necessary for our <b>legitimate interest</b> in ensuring the proper operation of our services.</p>
<p>To monitor our networks, website and systems for suspicious activities, test and audit our systems and deploy appropriate <b>security measures</b>.</p>	<ul style="list-style-type: none"> <li>● usage data</li> <li>● device &amp; browser data</li> </ul>	<p>Necessary for our <b>legitimate interest</b> to ensure the security of our organisation, people and services and necessary for compliance with a <b>legal obligation</b> to which we are subject.</p>
<p>To record your name and contact details for security purposes. The data will only be used to protect our people and assets.</p>	<ul style="list-style-type: none"> <li>● Name and contact details</li> </ul>	<p>Necessary for our <b>legitimate interest</b> to ensure the security of our organisation, people and services.</p>
<p>To monitor interactions and operations for <b>fraud prevention</b> and crime detection purposes, including information from <b>third parties</b> who may help us verify your identity or alert us about suspicious activities.</p>	<ul style="list-style-type: none"> <li>● contact details</li> <li>● usage data</li> <li>● browser &amp; device data</li> <li>● interaction data</li> </ul>	<p>Necessary for our <b>legitimate interest</b> in detecting and preventing fraud and illegal conduct and necessary for compliance with a <b>legal obligation</b> to which we are subject.</p>

Purpose	Personal data	Legal ground for processing* (for individuals in the EEA and UK only)
To share information with our <b>affiliated companies</b> .	<ul style="list-style-type: none"> <li>third party data</li> <li>any necessary information on a proportionate and lawful basis</li> </ul>	Necessary for our <b>legitimate interest</b> in using our group's resources to organise, develop and deliver our services, run our organisation and decide on future strategies.
To share data with another organisation in accordance with the law for the purposes of a <b>joint venture, collaboration, financing, sale, merger, reorganisation</b> or similar event relating to our business.	<ul style="list-style-type: none"> <li>data necessary in connection with the event</li> </ul>	Necessary for our <b>legitimate interest</b> in acting in the best interest of our shareholders and investors and complying with our <b>legal obligations</b> .
To process information as is required for our <b>compliance with the law</b> or to establish, exercise or defend <b>legal claims</b> .  To process and share information with other third parties where required by law, such as <b>regulators, law enforcement agencies</b> or where mandatory under a <b>court order</b> .	<ul style="list-style-type: none"> <li>Any information subject to mandatory processing or disclosure, where this is proportionate and lawful</li> </ul>	Where processing or sharing your data is necessary for compliance with a <b>legal obligation</b> to which we are subject, to <b>establish, exercise or defend legal claims</b> , or, where necessary and proportionate, in order to satisfy our <b>legitimate interest</b> in complying with best practice or applicable laws.

We will update you about any new purposes of processing of your personal data from time to time, and we will obtain your prior **consent** for such new purposes where we are required to do so at law.

## 5. Sharing your information

We will generally not share your information except with (i) our **advisors** or **third party service providers** who may process personal data on our behalf, (ii) our **advertising, marketing** and **analytics partners**, as explained above and in our [Cookie Notice](#), (iii) our **affiliated companies** for the purposes set out above, (iv) persons or authorities where we are **compelled by law** or responsible practices, (v) to the relevant entity in case of a merger, acquisition or collaboration, and (vi) other third parties where you have provided your **consent**.

## 6. Third parties may process your information

Our services may contain links to other websites, third party services, such as Twitter and LinkedIn and plugins. You should check the privacy statements of these third party providers before you use them as we are not responsible for how they may process your personal data.

## 7. How long is your information kept?

We will generally comply with the retention periods in the table below. However, there may be situations where longer retention is necessary for the purposes listed above or required by law. You may contact us for further details or request deletion of your personal data at any time.

Category of personal data	Retention period
contact details interaction information	Generally, 3 years following collection or 7 years following resolution or file closure. Interaction information about prospects may be retained for 1 year following last interaction.
relationship management data	1 year following last interaction
usage, browser and device data, engagement information	[see <a href="#">Cookie Notice</a> ]
Visitor data	6 months after collection.
all other personal data	7 years from collection.

After the retention period, your personal data will either be securely deleted or anonymised and it may be used for analytical purposes. You must back up your data if you wish to keep it for longer.

## 8. How do we secure your information?

We maintain appropriate organisational and technological safeguards to help protect against unauthorised use, access to or accidental loss, alteration or destruction of the personal data we hold. We also seek to ensure our third-party service providers do the same.

We will endeavour to use the least amount of personal data as is required for each purpose. We will employ pseudonymisation and anonymisation techniques, where appropriate.

Our staff will access your personal data on a “need to know” basis.

## 9. Where is your information processed?

We may transfer your personal data to our affiliated companies, suppliers and other third parties in countries different to your country of residence. Generally, your information is held in the United Kingdom and the European Economic Area.

Where necessary, we will comply with applicable rules about international transfer of personal data.

## 10. Opt-out

If you would like us to stop sending you marketing communications and to process your personal data for direct marketing purposes, please let us know.

You can request to stop receiving our marketing communications at any time by clicking on the unsubscribe link at the bottom of each marketing message.

## 11. Your rights

Subject to certain exemptions, limitations and appropriate proof of identity, as a data subject, you will generally have numerous rights in relation to your personal data that you may exercise with the controller, including the following:

- **Right to information** about matters set out in this notice. You may also contact us for further details about our retention policy and international data transfers.
- **Right to make an access request** to receive copies of personal data.
- **Right to rectification** of any inaccurate or incomplete personal data.
- **Right to withdraw consent** previously provided.
- **Right to object to** our processing of personal data based on our legitimate interests, and any automated processing and profiling.
- **Right to erasure** of personal data, within limited circumstances.
- **Restriction** on the processing of personal data.
- **Right to data portability** from one service provider to another, where applicable.
- **Right to lodge a complaint** with your country's supervisory authority, such as the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).

All requests will be processed in a timely manner, generally within one month. If we cannot process your request within this period we shall explain why and process it as soon as possible thereafter.

## 12. Contact us

Please email us if you have any queries or concerns about how we use your personal data. We will try to resolve your query without undue delay.

**E-mail:** [enquiries@channelcapital.io](mailto:enquiries@channelcapital.io)

**Telephone:** +44 207291 5160

**Address:** 44 Whitfield street, London W1T 2RH, UK

## 13. Updates

If we make any changes to our notice you will be able to see them on this page. You should regularly check for updates, as indicated by the "Last updated" date at the top.

If you do not agree with the changes, please do not continue to use our website or services. Of course, if any such changes significantly affect you, we will ask for your prior consent where we are required to do so by law.