



CAPITALCLAN

Privacy Policy V1

At Capital Clan, we pride ourselves on maintaining the highest levels of security, transparency and integrity in our work, and recognise the importance of protecting and respecting your personal information.

To provide you with our services we need to know things about you. We will only collect information we need to provide you with the services you have requested and will handle your information with the utmost care.

Any information we receive about you will be subject to strict controls to minimise the risk of misuse – including unauthorised access to, or disclosure of, your personal information. This Privacy Policy applies to information that Capital Clan may collect about visitors to its website (even if you do not become a customer), companies and individuals who register for its services, and continue using its services, and any other person who contacts Capital Clan over the telephone or in writing.

Please read this Privacy Policy carefully, together with the Capital Clan Terms and Conditions and any other documents referred to within. For the purposes of this Privacy Policy, the term “personal information” means any data that can identify you as an individual for example name, address and contact information.

Who we are

We are Capital Clan UK Limited (referred to in this Notice as “**Capital Clan**”, “**we**”, “**us**” or “**our**”) with our company address: 71-73 Shelton Street, Covent Garden, London W1CH 9JQ and *Capital Clan PTE Ltd of 2 Venture Drive, #14-02 Vision Exchange, Singapore 608526*

Capital Clan acts as the “controller” of your personal information for the activities described in this Privacy Policy. That means Capital Clan is the legal entity deciding why and how your personal information is collected and used.

If you would like to know more about any of the terms of this Privacy Policy, please contact us (please see **Section 12** below) so that we can help you with any questions or concerns.

What information do we collect? And how do we collect it?

Information you provide to us

To open an account or use Capital Clan services, you will be asked to provide identifying information about yourself (e.g. name, address, date of birth, and email address) and your company (together, “**Account Information**”), together with documents to verify the information provided – such as, a copy or record of your identity cards, passport or other travel document information, your proof of address, occupation, nationality, country of birth, source of funding, source of wealth and/or other information from checks, credit cards, bank statements, address proofs or money orders (together, “**Identification Information**”). You will also be asked to provide “**Profile Information**” including your username and password.

In order to make payments, you will be asked to provide the information required to facilitate the payment – e.g. Beneficiary Information (see below) and certain Transaction Information (see below) – in particular, bank account details and source of funds.

Through the course of our business relationship, we may ask for additional evidence in order for us to comply with our legal obligations – e.g. anti-money laundering regulations. These can include, but are not limited to, documents required to verify any information provided or evidence of source of funds (“**KYC/ AML Information**”).

Information we collect when you use our website or app

Our website uses cookies to provide you with a better experience on our website, for fraud prevention and to provide internet-based advertisements such as banner advertisements on the website or app. For detailed information on the cookies we use and the purposes for which we use them, please see our full cookie policy.

The Capital Clan user community participants will have their sessions recorded to allow us to capture the feedback to improve our services and help with the development of new products.. For the detection and prevention of fraud and cyber-crime, we will collect information, including session, device and IP address (“**Device Information**”) to help ascertain the legitimacy of the account login. We will also collect information about your activities on and use of our website or app including, for example, browser history, product engagement, IP address or other unique identifiers, and other information regarding your interaction with our website or app and our advertisements (“**Usage Information**”).

Public information

For non-registered users, we may contact you using publicly available information or information from third parties (i.e., name and contact details), which you have consented to being shared, to let you know about products that could be relevant for your business. Such third party sources include, for example, social media platforms, company registration lists, and telephone and other publicly available directories.

Transactional information

Once your account is fully set up and you begin to transact with us we will collect, process and store your Capital Clan financial and transactional information. This information includes the amount, currency, type of transaction, source of funds, exchange rate, recipient name and bank details (together, “**Transaction Information**”).

Information about you that we receive from third parties

To protect ourselves and our customers against fraud, we verify the information you provide (e.g., the KYC/ AML Information) with anti-fraud agencies and electronic identity verification services. In the course of verification, we receive and process information about you from such services. It may include the collection of biometric information (via facial recognition technologies) used for real identity verification and authentication purposes.

Information may also be collected from credit reference agencies.

Communications

All calls are recorded and correspondence retained for the purposes of quality control and training, as evidence of transactions and to fulfill regulation requirements. Any information you disclose to us will be held on these recordings in compliance with applicable law (**"Call Recording Information"**).

Individuals who are not registered users of Capital Clan

Connected parties

Capital Clan will collect information about connected parties to a Capital Clan client during the course of the business relationship from the client to comply with our legal obligations – e.g. directors or shareholders of a company (**"Connected Party Information"**). Where customers provide this information, they are responsible for bringing this Privacy Policy to the attention of the individuals concerned.

Beneficiaries

Capital Clan will collect information required to be able to send a payment to an individual, who may not be a Capital Clan client. This will include name and bank account details that are required by regulations to process the payment (**"Beneficiary Information"**).

Banking Partners

Capital Clan uses various banking partners around the world to ensure your payment can get to where it needs to go as quickly as possible. When you transact with Capital Clan, we will need to share your personal information with payment providers or banking partners including, those located outside of the UK, such as intermediary or beneficiary banks – e.g. if you ask us to make a USD payment to China – Hong Kong the funds may be cleared through an intermediary bank in the US before reaching China – Hong Kong.

For transparency, verification and legal requirements, we are required to include certain information on the payment which could include: Account Information, Beneficiary Information and your Identification Information.

In addition, where you use the services of a banking partner of ours, and/or a banking partner requests us to provide certain data about you according to your authorization, we may share your data with such banking partner to provide the relevant banking services to you.

Trusted Partners

If one of our trusted partners introduced you to Capital Clan, we may provide them with your personal information that are necessary to fulfil our contractual obligations with the partner. We may also cooperate with trusted partners to provide financial services to you. In order to provide such financial services that are suitable for you, we may share and personal information that are necessary with trusted partners to determine whether you are suitable for such services and accordingly credit worthiness and your credit. This may include the conduct of soft searches and the use of scoring methods to identify risk and verify identity. These activities may also involve the use of electronic verification tools (such as, facial recognition technologies) and the collection of biometric data. We require trusted partners to undertake a strict confidentiality obligation and not to use your data that we share with them for any other

purposes. We would also require trusted partners to adopt sufficient technical security measures to protect your data.

Additionally, we may share your contact details with a trusted partner for marketing purposes if you have given your consent to do so.

Contractors, Professional Advisors and Service Providers

We may share any personal information identified in Section 3 above with our contractors, professional advisers and third party service providers who provide administrative, customer support, telecommunication, computing, remittance or other services to us in connection with the operation or maintenance of our products and services. These companies do not have any rights to market other services to you.

Other Parties

If you are a seller on an e-commerce platform, we may share your personal information with those e-commerce platforms that are necessary to help detect and prevent fraud, money laundering, dealing in counterfeit goods and other criminal or abusive behaviour. We provide such information to allow such platforms to identify Capital Clan accounts used by their sellers, and then, for these specific accounts, provide information about the account holder and its associated persons, payments out of the account, other accounts linked to that account, and indications of suspicious activity on the account.

We may share your personal information with actual or proposed entities involved in any merger, acquisition, corporate reorganisation or financing, or similar transaction with us, including in the event of the sale of all or part of our assets: All personal information categories included in **Section 3** may be disclosed on a need-to-know basis depending on our business needs.

Also, we may share your information with any person acting on your behalf provided that you have given us the permission to do so.

Regulators and Law enforcement

We may need to pass necessary information to Governmental departments, regulatory bodies, law enforcement/tax/customs agencies, courts of law or other third parties including, where we are asked to do so. This may include all personal information.

How long does Capital Clan keep your information

Capital Clan will only retain your personal information for as long as is necessary to provide our services to you and will not hold or process your personal information for any longer than we are legally permitted to. The criteria used to determine the appropriate retention period includes:

- Regulatory requirements Capital Clan is subject to
- Whether a legal claim could be brought against Capital Clan
- Necessity of information to provide our service to our customers
- The types of personal information being processed
- The legal basis for processing your information – e.g. consent

Information about connected parties and beneficiaries, which may not belong to a Capital Clan client, are stored for a period to comply with applicable legal requirements.

What are your rights?

You have certain rights in respect of your personal information as outlined below. If you would like to exercise any of the below rights then please contact Privacy Officer and we will respond to your request. However, please note that the below rights are not absolute and may be subject to limitations.

As necessary we will request you to provide proof of identity and to provide sufficient information to enable us to locate relevant information and verify that the person making the request is entitled to do so.

To ask for information that Capital Clan holds about you to be corrected

Where the personal information that we hold about you are incorrect, you have the right to request amendments to be made.

To ask us to erase your information if we no longer have a reason to hold it

You have a right to request for the deletion of your personal information that we hold.

To ask us to restrict the processing of your personal information

You have a right to ask that we restrict or suppress the processing of your personal information which means that whilst we are permitted to store the personal information we cannot otherwise process it.

To ask for a copy of the information Capital Clan holds about you

You have a right to receive a copy of your personal information. You also have the right to ask for a copy of your personal information to be provided to a third party in certain circumstances.

To withdraw your consent

You have a rights to withdraw your consent to the processing of your personal information at any time (where Capital Clan is processing your personal information based on your consent) by contacting us using the details in **Section 12** below. Please note that withdrawing your consent may prevent us from further providing all or part of our services to you but does not affect the lawfulness of our processing of your personal information based on such consent before the withdrawal.

To object to the processing of personal information by Capital Clan

If you object to the processing of your personal information (including, profiling) which we carry out in reliance on our legitimate interests, we will investigate to see if there is compelling reason for processing to continue.

You can not object to the processing which is a legal obligation or where we must process your information to satisfy a contract to which you are a party.

Also, you can object to marketing communications at any time.

To ask not to be subject to solely automated decision making (including, profiling)

Capital Clan puts people first. There will not be any scenarios in which profiling or automated decision making will have a legal or similarly significant impact on you without a person reviewing or making a decision on the result.

Security

We store all data electronically and physically in a manner aimed at securing and protecting the data's confidentiality, integrity and availability. Data is stored on servers which are protected by actively maintained firewalls. We make use of up-to-date anti-virus software and our servers have restricted access.

If you provide paper-based documentation for the purpose of identity verification these will be stored electronically and the original will be destroyed securely or returned to you.

Transmission of data on the internet can never be completely secure. We do not and cannot guarantee the security of information collected or transmitted electronically however, we take reasonable care to safeguard your personal information.

Changes to our Privacy Policy

We may change, amend or revise this Privacy Policy from time to time including, for example, in response to changing legal, technical or business developments. We will take appropriate measures to notify you of any substantive or material changes. You can view the latest version of this Privacy Policy on our website at any time and you are encouraged and responsible for consulting the latest version of this Privacy Policy before making use of the services referenced in this Privacy Policy.

Once posted on our website the new Privacy Policy will become immediately effective.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.