

1. Privacy

1.1 GFA Exchange is a licence-based service provided by Growth Finance Analytics Ltd t/a GFA Exchange ("us", "we") at www.gfaexchange.com ("GFA Exchange").

The usage of GFA Exchange relates to:

- a) Clients (such as banks, independent financial lending organisations, professional service sector firms or any organisation that has paid for a portfolio review or annual license (by monthly subscription or direct annual license) and has entered into a partnership agreement to hold a GFA Exchange account, so they can upload their own business registration data, send data aggregation links to their individual customers and clients, review financial metric data securely, and receive tailored business results and insights (a "Client");
- b) Customers of a Client, who provide their own business registration data and financial metric data securely, and receive tailored business results and insights, through the services of a GFA Exchange client ("Users");
- c) Stakeholders (such as accountants, franchisors or industry bodies) who use GFA Exchange provide access to network data, analyse industry data and/or Client-specific data and/or data relating to their clients (where permitted to do so) ("Stakeholders")

1.2 We are committed to ensuring the privacy of all users' personal information, so please read this Privacy Policy carefully to make sure you understand how your information is used.

1.3 **Our Terms of Use** also describe the terms on which our website and Services can be used, and should be read in conjunction with this Privacy Policy.

2. Application of this Privacy Policy

2.1 This Privacy Policy applies to personal information submitted into GFA Exchange and any personal information that may be retrieved through your use of GFA Exchange.

2.2 By accessing or using GFA Exchange, you consent to the collection, use, disclosure, storage, and processing of your personal information in accordance with this Privacy Policy. If you don't agree to this policy, you must not use GFA Exchange.

3. What information we collect

3.1 We collect personal information about you when you create an account and when you access and use GFA Exchange.

In particular, we may collect:

- a) your company/personal name;
- b) your contact details;
- c) payment related information;
- d) information you provide about yourself when using GFA Exchange (for example, when used to benchmark financial metric data);
- e) information about how GFA Exchange is used (for example, traffic volumes, time spent perusing client data results, etc)
- f) your IP address and/or other device identifying data; and
- g) other information required to provide a service you requested

3.2 OPT-IN

In addition, GFA Exchange will also collect business information and feedback provided by you, or any other information about you from a third-party provider where you have opted (or authorised another person) to retrieve such information.

For businesses using GFA Exchange, other parties may also provide information about you. For example, your accountant may (with your permission) submit financial or other information about your business to GFA Exchange.

You are under no obligation to provide any such information. However, if you choose to withhold requested information, we may not be able to provide you with certain services or functionality.

We may use cookies to collect this information. Cookies are small pieces of information that are stored in a browser-related file on your computer's hard drive when you use GFA Exchange. You can stop the collection of your personal information by ceasing to use our services.

4. What we do with the information we collect:

4.1 We will use the personal information we collect, and may share such personal information with other entities (such as service providers) to:

- a) provide the GFA Exchange service;
- b) identify you when you sign in to your account and to verify that your account is not being used by others;
- c) carry out research and analysis so we can better understand and serve you;
- d) tailor content, advertisements or links to you;
- e) gather broad anonymous demographic data (such as the number of visitors from a geographic area);
- f) communicate with you in relation to GFA Exchange and any other services we provide from time to time;
- g) enforce compliance with our Terms;
- h) where you've given your consent, contact you for further information in relation to feedback you've given using GFA Exchange or share your information with companies about whom you've given feedback so they can contact you;
- i) verify and carry out financial transactions in relation to payments and subscriptions you make through GFA Exchange; and
- j) co-operate with any government, industry or regulatory authorities.

4.2 Data will always remain anonymous (unless you have consented to us sharing your name and other details with other companies). We will remove any identifying information before aggregating data and providing anonymised benchmarking business information to you and to our other Clients.

4.3 You can unsubscribe from any marketing communications from us by following the instructions on any communications sent to you. You can also exercise this right at any time by contacting us using the details at the end of this Privacy Policy.

4.4 We may sell data that we collect in an aggregated format. This data will not identify you personally and/or any client whose data and information you have provided to use. We may share and sell anonymous aggregated data with third parties, including service providers, our affiliates, agents and current and prospective business partners.

4.5 We may choose to sell our business. In these types of transactions, your personal information is typically one of the business assets transferred to the third-party purchaser. You acknowledge and agree that such transfers may occur, and that any acquirer of us or our assets may continue to use your personal information as set out in this Privacy Policy.

5. Storage and security of information

5.1 You should be aware that information transmitted over the internet is inherently insecure. We will take all reasonable steps to securely store any personal information collected through GFA Exchange.

This information may (for the avoidance of doubt) be transferred and stored on servers through the European Economic Area / Region; we notify you if any information is to be transferred and stored on servers outside the European Economic Area / Region.

5.2 Any personal information sent through GFA Exchange is passed through a secure server using encryption technology.

All personal information stored by us is protected through secure passwords, user log-ons and other security procedures.

5.3 In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information we hold. However, we will not be held responsible for any unauthorised access to your personal information made outside of the provision of GFA Exchange services.

5.4 You can play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used on GFA Exchange. Please notify us immediately if there is any unauthorised use of your account or any other breach of security.

6. Retention of your personal information

6.1 We will hold a Client's and customer's personal information if they have registered a formal account with GFA Exchange and for as long as is permitted by English law.

6.2 You have the right under the Data Protection Act 1998 to access and/or correct your personal information held by us. You can do this by contacting us using the details below.

7. Changes to our Privacy Policy

7.1 We may amend or update this Privacy Policy from time to time, with or without notice to you. You agree to be bound by the Privacy Policy in effect at the time you choose to use GFA Exchange. Revised versions will be effective immediately once posted on our website.

8. Contact Us

8.1 If you have any questions about this Privacy Policy, the practices of GFA Exchange, or if you would like to request access to, or correction of, your information, you can contact us at support@gfaexchange.com

9. More information about privacy

9.1 This Privacy Policy is governed by English law. For more information about privacy issues in England and protecting your privacy, visit the UK Privacy Commissioner's website: <https://ico.org.uk>