

## Privacy and Cookie Policy

The privacy of our visitors to [www.obuinvest.com](http://www.obuinvest.com) is important to us.

[www.obuinvest.com](http://www.obuinvest.com) (“**site**”) is owned by OBU Ltd, a company registered in England and Wales under company number 11698933 with our registered office at 14-16 Bridgford Road, West Bridgford, Nottingham, England, NG2 6AB ( “**we**”, “**us**” or “**our**”).

This Privacy and Cookie Policy tells you what types of personal information we receive and collect *when you use and visit our site, you engage with us, you use any of our programmes and events or sign up to our community or our online courses* and how we safeguard your information. We are the data controller and we are responsible for your personal data.

Our site is designed for users aged 18 years old and over. Please only provide personal information to us if you are over this age.

### Our contact details and legal compliance

Our full details are:

- Full name of legal entity: OBU Ltd
- Contact: Claire Dunn
- Email: [compliance@obuinvest.com](mailto:compliance@obuinvest.com)
- Postal address: 14-16 Bridgford Road, West Bridgford, Nottingham, England, NG2 6AB

We comply with our obligations under the retained EU law version of the General Data Protection Regulation (EI) (2016/679) and the Data Protection Act 2018 (“**data protection laws**”). If any of those laws are replaced or superseded, we will also comply with those.

We are registered with the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the ICO. If you do have a complaint, we would be grateful if you contacted us first [www.obuinvest.com](http://www.obuinvest.com) so that we can try to resolve the issue for you in a timely and efficient manner.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [compliance@obuinvest.com](mailto:compliance@obuinvest.com).

### What data do we hold about you?

#### Personal Data

Personal data means any information which is capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Profile Data** may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Transaction Data** may include details about payments between us and other details of purchases made by you.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Usage Data** may include information about how you use our website, products and services.
- **Financial Data** may include your bank account and payment card details. This will only ever be processed by our payment partners.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and your communication preferences.

We may also process **Aggregated Data** from your personal data. This is information that is gathered and expressed in a summary form for purposes such as research and statistical analysis. This data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

### **Special Categories of Personal Data**

We may ask to collect special categories of personal data about you, which is personal data that requires more protection because it is sensitive. Such data will be collected with your explicit consent when filling out questionnaires, or during workshops and events. You can choose not to provide special categories of personal data.

We may use the special categories of personal data that we have collected, where you have given your explicit consent to us doing so, in order to better serve and meet your needs or for research purposes.

We may collect the following special categories of personal data about you:

- Your access requirements;
- Your sexual orientation;
- Whether you have a disability or are neuro diverse;
- Your ethnicity.

We do not collect any other types of special categories of personal data, such as details about your religious or philosophical beliefs, sex life, political opinions, trade union membership, genetic and biometric data, or information about criminal convictions or offences.

## How we collect your personal data

We collect data about you through a variety of different methods including:

- Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise or by attending an event including when you:
  - order our products or services;
  - create an account on our site;
  - subscribe to our service or publications;
  - request resources or marketing be sent to you;
  - enter a competition, prize draw, promotion or survey; or
  - give us feedback;
  - or sign up to our platform.
- Automated technologies or interactions: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. Please see our Cookies Policy for further details.
- Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties: Facebook, Twitter, LinkedIn, Instagram
  - Analytics providers such as Google based outside the UK.
  - Search information providers such as Google based outside the UK.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe based outside the UK.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
  - Personal information such as your name and email address from public and private sector organisations who buy our programmes and services.

## How we use your personal data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us [compliance@obuinvest.com](mailto:compliance@obuinvest.com).

## Purposes for processing your data

Provided in the table below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purposes of Processing	Categories of Personal Data Collected For Each Purpose	Legal Basis of Processing	How We Gather Data From You
<p>Providing our site; personalisation; or event registration &amp; contests.</p>	<p><i>Directly from You:</i>  <i>your name, email address, physical address, phone number, and other similar contact information (Identity and Contact Data);</i></p> <p><i>payment information, including partial credit card number and billing address (Identity, Contact, Financial, Transaction, and Marketing and Communications Data);</i></p> <p><i>content of feedback, testimonials, inquiries, support requests, and any phone conversations, chat sessions and emails with or to us (Identity, Contact, and Profile Data);</i></p> <p><i>your image (still or video), voice, and other identifiers that are personal to you when you use certain features of our services (Identity Data).</i></p> <p><i>Location information (e.g., from your language preference on our site or a provided address) (Technical, Usage and Marketing and Communications Data); and</i></p> <p><i>any additional information you choose to share on our site.</i></p> <p><i>From third parties:</i>  <i>event registration information (e.g., name, email, address, company,</i></p>	<p>Necessary to enter into or perform a contract with you (upon your request, or as necessary to make our services available), establish, defend or protect legal interests, compliance with law, or necessary for our legitimate interests. We may also require to disclose this information to third party regulators, including the FCA.</p>	<p><i>We may collect personal data directly from you when you:</i>  <i>interact with the site or community features;</i></p> <p><i>search for or indicate interest in our services;</i></p> <p><i>register for or attend an event attended or hosted by us;</i></p> <p><i>communicate with us by phone, email, or other means; and</i></p> <p><i>fill out a webform, questionnaire, or other information request.</i></p> <p><i>We may collect personal data directly from you when you:</i>  <i>interact with our site or community features;</i></p> <p><i>download content from our site; and</i></p> <p><i>communicate with us by email (e.g., opening emails or accessing links in the emails).</i></p>

	<p><i>title, etc.) from event coordinators or vendors (Identity and Contact Data); and</i></p> <p><i>location of devices, for example through IP look-up (Identity and Technical Data).</i></p> <p><i>Automatically: email addresses and phone numbers used to contact us (Identity and Contact Data); and</i></p> <p><i>network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider (Technical and Usage Data).</i></p>		
<p>Marketing promotions; customer opportunities; advertising.</p>	<p><i>Directly from You: location information (e.g., from your language preference on the Site or a provided address) (Technical and Usage Data); and</i></p> <p><i>usernames, aliases, and other authentication information with respect to optional features (e.g., our community) (Identity, Contact, Profile, Usage, and Marketing and Communications).</i></p> <p><i>From third parties: name, email addresses, physical addresses, phone numbers, and other similar contact information (Identity and Contact Data); and</i></p> <p><i>business contact information, including mailing addresses, job titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs and custom profiles (Identity, Contact, Profile and Marketing and Communications Data).</i></p> <p><i>Automatically: network and connection information, such as the IP address used to connect your computer or other device to the internet and information about your Internet service provider (Technical and</i></p>	<p>Necessary for our legitimate interests, or with your consent.</p>	<p><i>We may collect personal data directly from you when you: interact with our site or community features;</i></p> <p><i>search for or indicate interest in our services;</i></p> <p><i>register for or attend an event attended or hosted by us;</i></p> <p><i>communicate with us by phone, email, or other means; and</i></p> <p><i>fill out a webform, questionnaire, or other information request.</i></p> <p><i>We may collect personal data directly from you when you: interact with the sites or community features;</i></p> <p><i>download content from our site; and</i></p> <p><i>communicate with us by email (e.g., opening emails or accessing links in the emails).</i></p>

	<p>Usage Data).</p> <p>identifiers and information contained in cookies (Technical and Usage Data) (see our Cookie Notice later in this Privacy and Cookie Policy).</p>		<p>We will collect sensitive business data, but this is not deemed to be personal data and is not within the scope of this Privacy and Cookie Policy.</p>
Analytics improvement &	<p>Directly from You: Your name, email address, physical address, phone number, and other similar contact information if you choose to participate in a survey or user interface study (Identity, Contact, Profile, Usage, and Marketing and Communications Data).</p> <p>From third parties: location of devices, for example through IP look-up (Technical and Usage Data).</p> <p>Automatically: identifiers and information contained in cookies (Technical and Usage) (see our Cookie Notice later in this Privacy and Cookie Policy);</p> <p>the full Uniform Resource Locators (URL) clickstream event data on our Site, including referrer data, click event data (including date and time), content you viewed or search queries on our Site, performance data (e.g., page response times), downloads, HTTP response codes, and page interaction information (e.g., clicks) (Technical and Usage Data); and</p> <p>network and connection information, such as the IP address used to connect your computer or other device to the internet and information about your Internet service provider (Technical and Usage Data).</p>	<p>Necessary for our legitimate interests, or with your consent.</p>	<p>We may collect personal data directly from you when you:</p> <p>interact with our site or community features;</p> <p>search for or indicate interest in our services;</p> <p>register for or attend an event attended or hosted by us;</p> <p>communicate with us by phone, email, or other means; and</p> <p>fill out a webform, questionnaire, or other information request.</p> <p>We may collect personal data directly from you when you:</p> <p>interact with our site or community features;</p> <p>download content from our site; and</p> <p>communicate with us by email (e.g., opening emails or accessing links in the emails).</p>

<p>Protect rights and prevent misuse, general business operations, or to comply with legal obligations.</p>	<p><i>Directly from You:</i> name, email address, physical address, phone number, and other similar contact information.</p> <p><i>Automatically:</i> network and connection information, such as the IP address used to connect your computer or other device to the Internet and information about your Internet service provider (Technical and Usage Data); and</p> <p>computer and device information, such as device, application, or browser type and version, browser plug-in type and version, operating system, or time zone setting (Technical and Usage Data).</p>	<p>Compliance with a legal obligation, or necessary for our legitimate interests.</p>	<p><i>We may collect personal data directly from you when you:</i> interact with our site or community features;</p> <p>search for or indicate interest in our services;</p> <p>register for or attend an event attended or hosted by us;</p> <p>communicate with us by phone, email, or other means; and</p> <p>fill out a webform, questionnaire, or other information request.</p> <p><i>We may collect personal data directly from you when you:</i> interact with our site or community features;</p> <p>download content from our site; and</p> <p>communicate with us by email (e.g., opening emails or accessing links in the emails).</p>
---	--	---	--

### Marketing Communications

The only time you will receive marketing communications from us is if you have opted in to receive such communications from us. You may do this during the process of purchasing goods or services from us; providing your details when you enter a competition; registering for a promotion or for free resources; completing a survey; attending a workshop or giving us feedback.

Every time we communicate with you, we will provide you with an option to opt-out should you no longer wish to receive these communications.

We may promote ‘partner’ services that we believe are relevant for our members, e.g. legal support/accountancy services/investment readiness support/tax services. This list is not exhaustive and we will notify you of any partnerships and you can object to receiving these communications at any time.

If you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

We may share your personal data with our marketing partners for marketing purposes with your consent.

### **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 we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **DISCLOSURES OF YOUR PERSONAL DATA**

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

#### **Third party service providers**

To make certain services available to you, we may need to share your personal data with some of our service providers (also referred to as sub-processors). These include IT, administration and software providers.

We only allow service providers to handle your personal data when we have confirmed that they have appropriate data protection and security measures in place. 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.

It is important to note that we have no control over the privacy policies/practices of these sub-processors, and we've summarised them in the table below to explain why we use them and where you can find more information about them.

<b>Sub-processor</b>	<b>What do we use it for?</b>	<b>More information</b>
<a href="#">Onfido</a>	We use Onfido to undertake AML/KYC checks	<a href="#">Privacy policy</a> <a href="#">Cookie policy</a>
<a href="#">Distinction</a>	Distinction is our tech party that built our site and house the personal data we collect	<a href="#">Privacy policy</a> <a href="#">Cookie policy</a>
<a href="#">Freshdesk</a>	We use Freshdesk to help us handle queries through our website and the Obu platform	<a href="#">Privacy policy</a> <a href="#">Cookie policy</a>



<a href="#">Cookiebot</a>	Cookiebot allow you to manage the cookies we use on the Obu website and Platform	<a href="#">Privacy Policy</a> <a href="#">Cookie Policy</a>
<a href="#">Stripe</a>	We use stripe to process payments	<a href="#">Privacy Policy</a> <a href="#">Cookie Policy</a>
<a href="#">Auth0</a>	Auth0 are used to streamline your login and make it as easy as possible to access the platform	<a href="#">Privacy Policy</a> <a href="#">Cookie Policy</a>
<a href="#">Logate</a>	Used to look up your address quickly and easily	<a href="#">Privacy Policy</a> <a href="#">Cookie Policy</a>
<a href="#">GTM</a>	Allows 3rd party tracking scripts to be used across the Platform	<a href="#">Privacy Policy</a>
<a href="#">GA4</a>	Used to track actions within the Platform	<a href="#">Privacy Policy</a>
<a href="#">Send Grid</a>	Used to send messages within the Platform	<a href="#">Privacy Policy</a>
<a href="#">Active Campaign</a>	Used to keep in touch via email messages sent to your email address	<a href="#">Privacy Policy</a> <a href="#">Cookie Policy</a>

Where we share your personal data with those sub-processors, they will be bound by confidentiality and data protection obligations. We do this to ensure that your personal data is kept safe and secure.

We may also share your personal data with:

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Our marketing partners with your consent, please note that you can withdraw your consent or opt out of marketing communications at any time.
- Public libraries and local authorities, with your consent.

We will never sell or rent your personal data to other organisations for marketing purposes.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## **INTERNATIONAL TRANSFERS**

Many of our third parties service providers are based outside the European Economic Area (EEA) or the United Kingdom (UK) so their processing of your personal data will involve a transfer of data outside of the EEA or the UK.

Whenever we transfer your personal data out of the EEA or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the EEA or the UK.

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

## **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.

Those measures are:

- Storing data on secure platforms;
- Password protected accounts;
- Limiting access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. 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.

## **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us [compliance@obuinvest.com](mailto:compliance@obuinvest.com)

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 may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

## **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 notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **COOKIES NOTICE**

Our website uses cookies in accordance with the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and data protection laws to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our site, the pages you have visited and the links you have followed. We will use this information to make our site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third-party cookies are likely to be analytical cookies or performance cookies or targeting cookies:

- **Google Analytics** – this is a web analytics service provided by Google, Inc. The cookies used by Google Analytics help us to analyse how users use our site and to count the number of people who use it. Google Analytics stores your IP address anonymously. Google does not associate your IP address with any personally identifiable information;
- **Facebook Ads (the Facebook pixel)** – these cookies collect information about how visitors use our site. This data is collected anonymously and is used to help improve our site's functionality; and
- **Google Ad Words** – these cookies collect information about how visitors use our site. This data is collected anonymously, to help make our marketing communications more relevant, and is used to improve our site's functionality.

We will always ask for your consent to use non-essential cookies. You are free to withhold consent to this, but it means that we might not be able to provide the full website experience to you, including some elements of video advertising. If at any time you wish to disable our cookies, you can do so through the settings on your browser, or whenever the pop-up appears on the site (each time you access the site).

## **Updates to this Privacy and Cookie Policy**

This notice was last updated on: 9th May 2023.

We may update this Privacy and Cookie Policy from time to time so please check this page regularly to ensure you are happy with any changes.