

PRIVACY NOTICE

Last updated: 6th August 2024

INTRODUCTION AND DEFINITIONS

Cor Financial Solutions Limited ("**Cor**") and its subsidiaries ("**we**", "**our**" and "**us**") are committed to protecting and respecting your privacy. This notice (along with any contract you have with us) tells you how we process your personal data.

If you have questions about correcting or deleting your personal data please refer to sections 6 and 11 below.

References in this notice to "**data protection law**" mean (as applicable) the UK retained law version of the General Data Protection Regulation (Regulation (EU) 2016/679) and all related data protection legislation having effect in the United Kingdom from time to time.

1 OUR DETAILS

- 1.1 This section gives you the legal name of the company who holds your personal information – known as the 'legal entity' – and tells you how you can get in touch with us.
- 1.2 Cor has a number of subsidiaries, whose details are set out below. We'll let you know which you have a relationship with when you deal with us or purchase a product or service from us. The company you have a relationship with will be the company that controls your personal data and "we", "our" or "us" refers to that company. Details of Cor and its subsidiaries are as follows:
 - 1.2.1 Cor Financial Solutions Limited, a company incorporated in England and Wales under registered number 03251713 whose registered office is at 73 Cornhill, London EC3V 3QQ
 - 1.2.2 BITA Risk Limited, a company incorporated in England and Wales under registered number 02790333 whose registered office is at 73 Cornhill, London EC3V 3QQ
 - 1.2.3 COR STP Solutions Limited, a company incorporated in England and Wales under registered number 04708688 whose registered office is at 73 Cornhill, London EC3V 3QQ
 - 1.2.4 COR Intelligent Banking Solutions Limited, a company incorporated in England and Wales under registered number 04411313 whose registered office is at 73 Cornhill, London EC3V 3QQ
 - 1.2.5 COR Technology Services Limited, a company incorporated in England and Wales under registered number 04448934 whose registered office is at 73 Cornhill, London EC3V 3QQ
 - 1.2.6 Integra SP Limited, a company incorporated in England and Wales under registered number 03926241 whose registered office is at 73 Cornhill, London EC3V 3QQ
 - 1.2.7 COR-IBS, Inc, a company incorporated in Delaware, United States of America under registered number 2901111 whose registered office is at 251 Little Falls Driver, Wilmington, Little Castle, DE 19808, United States of America.
- 1.3 The data protection officer for the group is Jon Glover, Group Network Manager, Cor Financial Solutions Limited 107 Cannon Street, 5th floor, London, EC4N 5AF.
- 1.4 The authorised representative of COR-IBS, Inc is Cor Financial Solutions Limited.

2 HOW DO YOU PROCESS MY PERSONAL DATA?

- 2.1 The following table explains how we process your personal data:

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Scenario	Categories of Personal Data we process	Lawful Basis
<p>You are a customer or work for one of our customers and you or the organisation you work for enters into an agreement with us to purchase our goods or services (including the provision of software and support).</p>	<p>Name, contact information and details of the goods/services purchased. Customer's bank details for invoicing. All details relating to order, including requests for support and/or disputes or claims.</p>	<p>If the contract is with you, the processing is necessary for us to perform our obligations under the contract.</p> <p>If the contract is with your organisation, then we have a legitimate interest in processing your personal information for the purpose of managing the contractual relationship between your organisation and us.</p>
<p>You are a client of one of our customers, and your personal data resides in a database managed by one of our software products.</p>	<p>Where applicable: Name, contact information, and any other details captured in the database by our customers.</p>	<p>It is our policy not to process personal data contained in databases created using our software products save where we are hosting the software and the databases in the cloud on behalf of our customer. When we provide technical support on our software products (that are not hosted by us) it is our policy to require our customers to delete any personal data from any database they give us access to for support purposes. If we discover that a customer has sent us a copy of such a database for support purposes which contains personal data, we will use all reasonable endeavours to delete such copy as soon as we can and ask our customer to send a version of the database with all personal data removed. We rely on our legitimate interests to remove such end-client data to minimise data processing.</p> <p>Where we provide hosted software products, it is not possible for us to avoid processing end-client personal data in this way. We have a legitimate interest in processing such personal data for the purpose of fulfilling our contractual obligations to our customer to provide and support a hosted software product.</p>
<p>You have asked us to be added to our marketing list, or we have added you to a marketing list.</p>	<p>Name, contact information, marketing preferences.</p>	<p>We rely on your opt-in consent to send you marketing communications based on your opt-in.</p> <p>Where we have added you to a marketing list, we rely on our legitimate interests to promote our business to you. However, you have the option to unsubscribe at any time. We will not rely on this lawful basis for private email accounts.</p>
<p>Notifying you about important changes or developments to our site, products or services.</p>	<p>Name and contact information.</p>	<p>We have a legitimate interest in keeping you informed of changes that may affect you.</p>
<p>You are a customer or a supplier and you</p>	<p>Your name and contact details and</p>	<p>We have a legitimate interest in responding to</p>

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contact us with questions	details of your enquiry.	<p>your enquiry.</p> <p>We process your information to carry out pre-contractual steps relating to a potential contract between us.</p> <p>We have a legitimate interest in keeping a record of your request as well as our response. This helps us efficiently operate our business.</p>
You are a customer, supplier or other individual and you visit our premises for a meeting with us.	CCTV footage recorded at and around our premises.	We have a legitimate interest in using surveillance on our premises to monitor safety and misconduct.
You are a prospective customer or supplier and we collect information about you from social media or from other publicly available sources of information.	Name and contact information.	We have a legitimate interest in collecting information on prospective customers and suppliers so we can continue to run our business efficiently.
You are a supplier (or work for one of our suppliers) and we purchase goods or services from you.	Name, contact information, and details of the order we place with you (or the supplier you work for), including all related correspondence. Supplier's bank details for invoice payment purposes.	<p>We have a legitimate interest in processing your personal information for the purpose of managing the contractual relationship between our suppliers (or someone who works for one of our suppliers) and us.</p> <p>We have a legitimate interest in keeping a record of invoices we receive from our suppliers.</p>
Tracking activity on our website through the use of cookies.	IP address and approximate location.	After obtaining your consent to setting the cookies, we have a legitimate interest in monitoring how you interact with our website in order to improve it and troubleshoot issues.
Keeping records / sharing data with professional advisers or HMRC, courts, or other official organisations with relevant jurisdiction.	Name, contact information, details of any transactions.	We keep legal and financial records relating to our business for our legitimate business interests and to comply with our legal obligations.
You (or the organisation you work for) make(s) a claim against us or we make a claim against you (or the organisation you work for).	Name, contact details, and all details relating to the claim, including correspondence.	We have a legitimate interest in enforcing and defending our rights in legal proceedings.

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3 DURATION AND FURTHER PROCESSING

- 3.1 We only keep your information for so long as it is reasonably necessary. When setting our data retention periods, we consider the amount, nature, and sensitivity of the information we hold, the potential risk of harm from unauthorised use or disclosure of the information and the purposes for which we process the information (including whether we can achieve those purposes by other means). We also take into account our other legal obligations to keep or securely dispose of personal information.
- 3.2 Generally speaking, we retain your information for the following periods of time:
- 3.2.1 If you are a supplier or client (or you work for one of our suppliers or clients) for the duration of our contract with you (or the person you work for) and for a period of seven years after the end of the contract.
- 3.2.2 If you are on our marketing database, until you indicate that you no longer wish to hear from us, although if you have not engaged with us for a long time, we may delete your contact details sooner.

4 WHO IS YOUR INFORMATION SHARED WITH?

- 4.1 In order to achieve the purposes set out in section 2 above, we may share your data with the following people or group of people:
- 4.1.1 We may share personal data with other members of the group of companies of which we form part.
- 4.1.2 We may share personal data with consultants, services providers, and other third parties that we work with to help us provide our services.
- 4.1.3 Our outsourced IT providers may have access to your personal data on our IT systems if such access is required to enable them to resolve problems with our systems.
- 4.1.4 We may provide personal data to our legal advisers or other professional advisers, if necessary to defend claims, protect our rights, or receive advice on compliance with the law.
- 4.1.5 If the situation should ever arise that we sell our business, or in the event of an actual or potential merger, divestiture, restructuring, reorganisation, dissolution or other sale, exchange, or transfer of some or all of our assets, including as a part of bankruptcy, liquidation or other proceeding, we may share personal data with other organisations such as potential purchasers of our business, subject to those persons entering into strict confidentiality obligations with us and only to the extent permissible under data protection law.
- 4.2 Other than as set out in the next paragraph, to the best of our knowledge, understanding and belief, if your information was collected from the United Kingdom or European Economic Area, then it will not be transferred outside of the United Kingdom, the European Economic Area or to any country which is not approved by the European Commission. If this changes then we will let you know.

5 YOUR RIGHTS

- 5.1 Under data protection law you may have the following rights:
- 5.1.1 if we are processing your data on the basis of your consent then you have the right to withdraw that consent at any time. Consent can be withdrawn by notifying us using the details set out in section 11 below. The lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent;
- 5.1.2 the right to access a copy of your information which we hold. This is called a 'subject access request'. Additional details on how to exercise this right are set out in section 7, below;
- 5.1.3 the right to prevent us processing your information for direct marketing purposes. We

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will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the details set out in section 11, below;

- 5.1.4 the right to object to decisions being made about you by automated means. We do not make automated decisions about you based on your information. We will inform you if your information is subject to automated processing in the future;
 - 5.1.5 the right to object to us processing your personal information in certain other situations;
 - 5.1.6 the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate;
 - 5.1.7 the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law; and
 - 5.1.8 in certain circumstances, the right to request the information we hold on you in a machine-readable format so that you can transfer it to other services.
- 5.2 You may also have the general right to complain to us (in the first instance) and to the Information Commissioner's Office (if you are not satisfied by our response) if you have any concerns about how we hold and process your information. Our contact details are set out in section 11, below. The Information Commissioner's Office website is www.ico.org.uk.
- 5.3 For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau (www.citizensadvice.org.uk) or the Information Commissioner's Office (www.ico.org.uk).

6 ACCESS TO INFORMATION

- 6.1 Under data protection law you may exercise your right of access by making a written request to receive copies of some of the information we hold on you. You must send us proof of your identity, or proof of authority if making the request on behalf of someone else, before we can supply the information to you. Requests should be sent to us using the contact details in section 11 below.
- 6.2 You will not have to pay a fee unless you are requesting copies of documents you already possess, in which case we may charge our reasonable administrative costs. We will also be allowed to charge you for our reasonable administrative costs in collating and providing you with details of the requested information which we hold about you if your request is clearly unfounded or excessive. In very limited circumstances, we are also entitled to refuse to comply with your request if it is particularly onerous.

7 COOKIES

- 7.1 Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.
- 7.2 For further information, please see our separate Cookies Policy, available here: www.corfinancialgroup.com/cookies-policy/ and here: www.beaconvu.com/cookies-policy/

8 DATA SECURITY

We use reasonable and appropriate safeguards to help protect your information and prevent unauthorized access. Unfortunately, however, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to our site or otherwise to our servers (such as by email). Any such transmission is at your own risk.

9 CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice to reflect changes to our privacy practices at any time and without prior notice to you. When we do so, we will update the Effective Date of the privacy

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notice, above. Any material changes we may make to our privacy notice in the future will be uploaded to our website and if the change is significant we will send you the updated notice by email. Please check back frequently to see any updates or changes to our privacy notice.

10 CONTACT

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed by email to Jon Glover at: Jon.glover@corfinancialgroup.com or by post to Jon Glover, Group Network Manager, Cor Financial Solutions Limited, 107 Cannon Street, 5th floor, London, EC4N 5AF.