



PRIVACY POLICY

Comcor Investment Group respects your privacy and is committed to protecting your personal data. This privacy policy will inform you how will use your personal data when you engage with the business as a Member under our Member Terms (Member), a prospective Member (Applicant) or website visitor. It also tells you about your privacy rights and how the law protects you. Please note, this Policy does not apply to:

1. data belonging to prospective, current or former employees. Our Employee and Candidate Privacy Policies are available upon request using the details under paragraph [10]; or
2. beneficiaries of investments and or loans made by Comcor (including their staff, shareholders, office-holders). Our Beneficiary Privacy Notice is available upon request using the details under paragraph [10]

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1. Important information and who we are

This privacy policy gives you information about how Comcor Investment Group collects and uses your personal data belonging to you or your personnel in the context of your engagement with our business as a Member, Applicant or web user, through your use of our website and through any of the other ways we interact, as set out in more detail in paragraph 3 below.

Our website is not intended for children and we do not knowingly collect data relating to children.

Controller

Comcor Investment Group (Group) is made up of different legal entities, details of which can be found here: [LINK]. This privacy policy is issued on behalf of the Group so when we mention “Comcor”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the Group responsible for processing your data. Comcor Investment Group Limited is the controller and responsible for this website and memberships.

If you have any questions about this privacy policy, including any requests to exercise your legal rights (Paragraph 9), contact us using the information set out in the contact details section (Paragraph 10).

2. The personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

Where an Applicant or Member is a corporate body, then we will process personal data about the directors, officers and ultimate beneficial owners of the corporate. This notice also explains how we process personal data about these individuals.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, any previous names and current/former aliases, username or similar identifier, marital status, title, date of birth, gender, nationality, occupation, UBO/Nominee/ Shareholder status.
- Contact Data includes home address (including time spent at address), business address, email address and telephone numbers.
- Eligibility Data includes residential status, right to reside status, employer information, Company/SPV details, director disqualification details, sanctions data, Senior Public Officer/Politically Exposed Person details.
- Financial Data includes bank account details, tax number, investment history details, bankruptcy/insolvency details
- Transaction Data includes details about payments to and from you.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- Profile Data includes your application status, membership numbers and details, communication preferences..
- Usage Data includes information about how you interact with and use our website, products and services.
- Communications Data includes your communication preferences.



We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our offering.

In certain circumstances, including our membership application process, our collection of the different categories of data set out above may include the collection of Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We also may collect Criminal Convictions and Offences Data. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of our engagement with you (as set out in our engagement letter and terms of business), and you fail to provide that data when requested, we may not be able to engage with you further. This may result in rejection of your membership application and/or revocation of your membership.

3. How is your personal data collected?

We use different methods to collect data from and about you including:

- In the process of carrying out work for you (or your business) where we will in almost all instances act as a controller. In very limited circumstances we may act as a processor in which case we will let you know and ensure that an appropriate contract is put in place.
- When we communicate with you by email or other electronic correspondence, by telephone or using video conferencing software. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for membership and receive Services.
- From third-party sources including:
 - Contact, Financial and Transaction Data from credit checking agencies based in the UK and EEA and banks based internationally.
 - Identity and Contact Data from publicly available sources such as Companies House, Land Registry, and the Electoral Register based inside the UK ;
- By virtue of our access to CCTV footage.
- Otherwise through operating our business.
- We also collect data from and about you via our website:
 - Through your actions (for example, when submitting a contact us form).
 - Through automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies [, server logs] and other similar technologies. See our cookie policy [LINK] for further details.
- Technical Data is collected from Google Analytics based outside the UK.



4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- Performance of a contract with you: Where we need to perform the contract we are about to enter into or have entered into with you.
- Legitimate interests: 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. These legitimate interests include our interests in managing our relationship with our Applicants and Members (and their staff where applicable), hosting Applicants, Members and others at our offices, and ensuring appropriate standards and compliance with policies, practices or procedures [OTHER LEGITIMATE INTERESTS].
- Legal obligation: Where we need to comply with a legal obligation to which we are subject.
- Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.
- Where processing of “special category data” is necessary in the context of legal claims or where another legal ground other than explicit consent is available to us under relevant data protection legislation.
- Where our Services require us to process “special category data” and where we have obtained your explicit consent to do so. If we seek and obtain your consent, you may withdraw it at any time.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Purpose/Use	Lawful basis and retention period
To check whether we can offer you, as an Applicant, membership to receive our Services (including carrying out all our regulatory compliance requirements, including anti-money laundering, anti-terrorism, sanctions, fraud and background screening).	Identity Contact Financial Eligibility Special Categories Criminal Conviction and Offences Data	Performance of a contract with you Necessary to comply with a legal or regulatory obligation Public interest Necessary for our legitimate interests (to detect and prevent the commission of fraud, money laundering and terrorism offences)



<p>To communicate with you and deliver our Services to you as a Member including the provision of information regarding investments and managing payments to and from Comcor.</p>	<p>Identity Contact Financial Transaction Communications</p>	<p>Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To facilitate loans made by you to Comcor.</p>	<p>Identity Contact Financial Transaction Eligibility</p>	<p>Performance of a contract with you Necessary to comply with a legal or regulatory obligation</p>
<p>To facilitate direct investments from you to third parties identified by Comcor as part of the Services (which may include, but not be limited to, sharing your personal data with any Group Company which may be involved in the investment).</p>	<p>Identity Contact Financial Transaction Eligibility</p>	<p>Performance of a contract with you Necessary to comply with a legal or regulatory obligation</p>
<p>To manage our relationship with you which will include notifying you about changes to our terms or privacy policy</p>	<p>Identity Contact Profile Communications</p>	<p>Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how Members use our products and services)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, suspected or actual breach response, support, reporting and hosting of data)</p>	<p>Identity Contact Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation</p>



<p>To deliver relevant website content to you and measure or understand the effectiveness of the website.</p>	<p>Identity Contact Profile Usage Communications Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products and services, to develop them, to grow our business)</p>
<p>To use data analytics to determine the number of people using our website, better understand how our website is used, make improvements to our website, Services, Member and Applicant relationships and experiences.</p>	<p>Technical Usage</p>	<p>Necessary for our legitimate interests (to define types of Members for our products and services, to keep our website updated and relevant, to develop our business)</p>
<p>Ongoing monitoring to prevent, identify and report malicious, unlawful or criminal conduct; meet anti-money laundering requirements and to prevent fraud.</p>	<p>Identity Contact Profile Usage Technical Eligibility Special Categories Criminal Conviction and Offences Data</p>	<p>Necessary for our legitimate interests (to prevent and respond to malicious, unlawful and criminal activity) Necessary to comply with a legal or regulatory obligation</p>
<p>To engage our professional advisors, third-party contractors and services providers.</p>	<p>Data subject to change. Please contact us for more information.</p>	<p>Lawful Bases are subject to change. Please contact us for more information.</p>
<p>To make suggestions and recommendations to you about Services that may be of interest to you</p>	<p>Identity Contact Technical Usage Profile Communications</p>	<p>Necessary for our legitimate interests (to develop our products and services and grow our business)</p>



Direct marketing and Third-Party Marketing

We do not undertake any direct marketing activities and do not share your personal data with third-parties for marketing purposes.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data] above.

- Specific third parties including:
 - CreditSafe monitoring system for identity checks, KYC checks, PEP Sanction and AML checks;
- Third-party companies belonging to our Group so that we can provide you with contracted Services.
- Our professional advisors who owes us a duty of confidentiality in respect of information we disclose to them, including our legal or tax advisers.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

6. International transfers

We do not transfer your personal data outside the UK unless you are based outside the UK and we communicate directly with you. Your personal data will be transferred out of the UK when disclosed to CreditSafe [and will stay within the EEA].

7. 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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.



8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements. By law we have to keep certain information about our Members and Applicants (including Contact, Identity, Financial and Transaction Data) for six years after their relationship with us ends. Where investments are made by Members, this retention period may increase to 12 years.

In some circumstances you can ask us to delete your data: see [Paragraph 9] below for further information. In some circumstances we will 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.

9. Your legal rights

You have rights under data protection laws in relation to your personal data to:

- Request access to your personal data (commonly known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (which we currently do not do).



- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us using the Contact details under paragraph 10.

No fee usually required

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 could refuse to comply with your request in these circumstances.



What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month (but no more than three months) if your request is particularly complex or you have made a number of requests. In this case, we will notify you of any extension applied within one month and keep you updated.

10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: data@comcorinvestmentgroup.com
- Postal address: 5th Floor, The Merchant, Plymouth PL1 2AG

11. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. [This version was last updated on 29/01/25. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address. Members are required to inform us immediately of any changes to your personal information under their Member Terms. If you fail to do so this will put you in breach of your contract with us.

13. 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 statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.