



THE PRIVACY NOTICE

PREPARED BY

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1. Data Protection and Disclosure of Information

In the course of our daily operations, we collect personal information (“**Personal Information**”) from our clients and potential clients to ensure we can meet their needs for a range of financial services and provide them with relevant information about our services.

Your privacy is of utmost importance to us. We are committed to respecting the confidentiality of your information and the privacy of all individuals, whether natural or juristic. This notice outlines how we manage your Personal Information and details your rights regarding our processing of it.

2. Definitions

Defined terms provided herein are defined within the Data Protection Act 2018 which contains UK General Data Protection Regulation, as may be amended or substituted from time to time (“**GDPR**”). To view the GDPR; <https://www.gov.uk/data-protection>.

Any reference to ‘us’, ‘our’, ‘we’ in this Notice is a reference DMA MB.

Similarly, any reference to ‘you’, ‘your’, ‘yours’ or ‘yourself’ in this Notice is a reference to any of our clients and potential clients as a Data Subject.

3. Who are we?

DMA Moneybetter Limited (“**DMA MB**”) is a directly regulated and authorised firm by the Financial Conduct Authority (firm reference number 828799).

4. Are the actions stipulated herein lawful?

We may be required to collect and use certain types of Personal Information to comply with the requirements of the law and/or regulations, however we are committed to processing all Personal Information in accordance with the GDPR, UK data protection laws and any other relevant data protection laws and codes of conduct (herein collectively referred to as “the data protection laws”) which are applicable to DMA MB and its business.

All the processing carried out by us falls into the permitted reasons, for example; our use of your Personal Information in order to comply with our obligations under contract.

This may include inter- alia:

- (i) where a contract is not yet signed but you have requested us to act as a first step (e.g. provide details of our services);
- (ii) online application forms that are completed prior to an agreement being signed; or
- (iii) to comply with legal or regulatory requirements, such as carrying out verification checks.

5. Disclosure of Personal Information

a. What information are we authorised to collect?

We collect information about you when you engage with us on any service which we provide. This information can relate to your personal and/or financial circumstances. It may also include special categories of personal data (the “**Special Category Data**”) such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site.

Kindly see the table below which houses a list of information that can be collected. This is not a closed list, and DMA MB may request necessary information on a case-by-case basis.

Name	Tax Statements	Political Opinion
Address	Financial Statements	Trade Union Membership
Contact Details	Education/Qualifications	Racial/Ethnic origin
Date of Birth	Employment Details/History	Religious Beliefs
Gender	Family Details	Philosophical Beliefs
Income/Wealth	Lifestyle/Social Circumstance	Sexual Orientation
Assets/liabilities	Location Data	Genetic Data
Account Balances	Physical Health Details	Biometric Data
Bank Details	Mental Health Details	Other...

We will collect and process this information only with your explicit consent, as outlined in the relevant contractual terms, including but not limited to our General Business Terms or other agreements entered into with you.

We also maintain records of your trading behaviour, including:

- (i) the products you trade with us and their performance,
- (ii) the products we trade on your behalf and their performance, and
- (iii) historical data regarding the trades and investments you have made.

Much of this information is collected to comply with our regulatory obligations. This includes verifying the identity of clients and maintaining records of regulated business, such as the products you invest in and historical data about your past investments. If you choose not to provide the required information, we may be unable to offer you the requested product or service.

If you provide us with any Personal Information relating to a third party (e.g., information about your spouse, children, parents, employees, or individuals associated with your company, organisation, or trust), by submitting such information to us, you represent that you have obtained their consent to do so.

Please note that DMA MB may receive Personal Information from direct clients, potential clients, or related parties to direct clients or potential clients. In instances where you provide information about a minor, you confirm that you possess the necessary competency to provide this information to DMA MB and have the requisite authority to consent to DMA MB processing such information on behalf of the minor.

b. When can we collect such information?

When the Special Category Data is required, we will obtain your explicit consent to collect and process this information. Should you be unable to provide this consent, such other party that has the necessary competence and authority to do so on your behalf will be utilised.

If we rely on your consent/ an authorised consent as our legal basis for processing your Personal Information, you have the right to withdraw that consent at any time by contacting us using the contact details set out at

the end of this Notice. Kindly note that, the withdrawal of consent may be limited by law or subject to the completion of a relevant service or other similar and related activity. Withdrawal of consent will likely result in the termination of services. Please refer to the applicable contractual terms governing your relationship with DMA MB.

From time to time, we may wish to contact you to offer additional products or services which may be of interest to you. To do this, we will obtain your consent. You may withdraw your consent at any time by notifying us at our main business address.

c. How do we collect Personal Information?

We collect your information through various means, such as your use of our services, interactions with us, including the account opening process, and information provided during ongoing client service correspondence and due diligence.

We may also gather Personal Information about you from third parties and publicly available sources.

Additionally, we may collect Personal Information through your use of our websites, applications, or cookies, particularly by recording your activity and the pages you visit on our websites (please refer to the section on Cookies below).

We may record any communications with you, whether electronic, telephonic, in person, or otherwise, which will serve as evidence of the communications between us.

This information is in compliance with our regulatory duties concerning our record-keeping obligations.

Please note that telephone conversations may be recorded, with a disclaimer provided at the beginning of each call. Additionally, if you visit any of our offices or premises, CCTV cameras may record your image and conversations.

d. What do we do with the Personal Information collected?

We may use information held about you in the following ways:

- (i) To provide you with any services and/or information you request from us, including fulfilling any obligations arising from contracts entered into between you and us.
- (ii) To notify you about changes to our services.
- (iii) To provide you with information by post, email, telephone, or other means about products and services similar to those you have previously purchased or expressed interest in, which are offered by DMA MB and which we believe may be of interest to you.
- (iv) To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical, and survey purposes.
- (v) To improve our sites to ensure that content is presented in the most effective manner for you and your device.
- (vi) To measure or understand the effectiveness of content we serve to you and others, and to deliver relevant content to you.
- (vii) To provide services such as 'most popular' information on our website.
- (viii) To deliver targeted advertisements to you and others as you browse the internet.
- (ix) To obtain your feedback on a product, service, or our sites via a third party appointed by us.
- (x) To allow you to participate in interactive features of our sites, when you choose to do so.

- (xi) As part of our efforts to keep our sites safe and secure, and to prevent and detect money laundering, financial crime, and other criminal activities.

We may share the Personal Information that we hold about you across DMA MB to enable us to better understand your needs and run your accounts in the efficient way that you expect. Your Personal Information may also be used by DMA MB for client modelling, statistical and trend analysis, with the aim of developing and improving our products and services.

We will never sell, trade, or rent your Personal Information to others; however, we may share your information with selected third parties including:

- (i) our service providers, suppliers and sub-contractors for the performance of any contract we have entered into with them. They may then process this data on our behalf to help run some of our internal business operations, for example, IT services.
- (ii) governmental or judicial bodies or agencies to comply with our legal and regulatory obligations;
- (iii) fraud prevention agencies, other companies and organisations to prevent or detect financial and other crime;
- (iv) non-affiliated companies may sometimes be used to provide certain services such as preparing and mailing prospectuses, reports, account statements and other information, conducting research on client satisfaction, and gathering shareholder proxies;
- (v) advertisers and advertising networks that require the data to select and serve adverts about our services to you and others. It will only be passed to third party advertisers in order to provide services on behalf of DMA MB;
- (vi) data, service and software providers that assist us in the improvement and optimisation of our sites; and
- (vii) credit reference agency or a verification company to conduct checks on you to verify the information you have provided.

Where we share your data with third parties, we ensure that your data is held securely and in line with applicable legislation.

e. How long do we keep hold of your Personal Information?

We are also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business

These are **minimum** periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it is in our legitimate interests to do so.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

You may also refer to our Retention of Documents Policy as displayed on our website.

f. How do we store the Personal Information that we hold?

Safeguarding the privacy of your information is important to us, whether you interact despite the method of communication. We hold Personal Information in a combination of secure computer storage facilities, paper-based files and other records, and take steps to protect the Personal Information we hold within our

possession from misuse, loss, unauthorised access, modification or disclosure. When we consider that Personal Information is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time in line with our regulatory obligations. If we hold any Personal Information in the form of a recorded communication, telephonic, electronic, in person or otherwise in relation to our regulatory obligations as detailed above, this information will be held in line with our regulatory requirements, which will generally be 5 (five) years after our business relationship with you has ended. Where you have opted out of receiving marketing communication, we will hold your details on our suppression list so that we know you do not want to receive these communications.

g. How do we manage and safeguard personal information?

We always take appropriate technical and organisational measures to ensure that your information is secure. In particular, we train our employees, who handle Personal Information, to respect the confidentiality of client information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary. We have appointed a Data Protection Officer as well as a Deputy to ensure that our management of Personal Information is in accordance with this Privacy Notice and applicable legislation.

The internet is an open medium and we cannot guarantee that any information you send to us by email or via our sites will not be intercepted or tampered with; any transmission is at your own risk. To help protect your Personal Information and minimise the risk of it being intercepted by unauthorised third parties our secure servers employ Secure Socket Layer v3 (SSL) or Transport LayerSecurity v1 (TLS) encryption when you submit information to us through our sites. This security is signified by the "https" and the padlock on the URL bar. Some older browsers do not allow the use of current SSL technology, and we therefore recommend that you use an up-to-date browser. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access

6. Automation

Your data is collected in order for us to carry out the service for which you engage us. If you are unsure about the outcome any automated process, you can contact us to discuss or to challenge the outcome.

We take measures to ensure the security of your data through our systems and control processes. We do not use any Special Category Data in the automated process unless it is strictly necessary to deliver our service, and we have obtained your explicit consent to do so. We regularly check our systems for accuracy and bias and feed any changes back into the design process.

7. Transferring of Personal Information outside our jurisdiction

Your Personal Information may be transferred to, stored at, and processed at a destination outside of our jurisdiction by our service providers. By submitting your Personal Information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with applicable legislation or other relevant laws, including contractual terms where necessary.

8. Marketing

We would like to send you information about our products and services and those of other companies linked by common ownership which may be of interest to you. If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members linked by common ownership. If you no longer wish to be contacted for marketing purposes.

9. Your right to access

You may request a copy of your Personal Information that we have on file.

Our Data Protection Officer is Alex Popplewell

Our Deputy Data Protection Officer is Russell Hornsby-Clifton

Kindly contact the above-mentioned persons with the following details:

Email Address	Alex.Popplewell@dma.co
Contact Number	+44 20 4583 3165
Email Address	Russell Hornsby-Clifton@dma.co

When your personal data is processed by automated means, you have the right to ask us to move your personal data to another organisation for their use. We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

10. Your rights as a data subject

Right to be Informed: Information about how their data is collected and used.

Right of Access: The ability to request access to their Personal Information.

Right to Rectification: The right to have inaccurate data corrected.

Right to Erasure: The right to request deletion of their data under certain conditions.

Right to Restrict Processing: The ability to limit how their data is used.

Right to Data Portability: The right to transfer their data to another service.

Right to Object: The right to object to data processing.

Rights related to Automated Decision Making and Profiling: Protections against automated decisions.

Right to Withdraw Consent: If consent was given for the processing of data, individuals can withdraw it at any time.

Right to Complain: Individuals can complain to the Information Commissioner's Office (ICO) if they believe their rights have been violated.

11. Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

You can configure your browser to refuse cookies. However, please note that some features of our website may not function properly as a result. You may also refer to our Cookie Policy as displayed on our website.

12. External Websites

Our sites may occasionally contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please be aware that they have their own privacy policies. We do not accept any responsibility or liability for these policies or for how these websites collect and use your data. Please review their privacy policies before submitting any personal information to these websites.

13. Changes to our privacy policy

We keep our privacy policy under regular review, and we will place any updates on this web page and inform you of any changes when they occur. This privacy policy was last updated on 08 April 2025.

14. How to contact us with any queries or complaints

Please contact us if you have any questions about our privacy policy or information, we hold about you:

By email: compliance.uk@dma.co

15. An alternative complaint mechanism

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF