ABANS GLOBAL LIMITED (AGL)

- **GENERAL DATA PROTECTION REGULATION (GDPR)**

Registered Office Address: 208 Uxbridge Road, Shepherds Bush, London W12 **7JD**
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The main focus of the General Data Protection Regulation (GDPR) of Abans Global Limited (AGL) is the protection of personal data and digital privacy.

Whats the GDPR?

The EU General Data Protection Regulation ("GDPR") comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Founded on the fundamentals of privacy by design and a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The GDPR is a new legal framework from the EU that takes effect on May 25, 2018. It's an updated version of the Data Protection Directive.

This law is designed to accomplish two main things:

1. Unify the current data protection privacy laws throughout the EU, and
2. Enhance the rights of citizens of the EU to protect their personal information

Who the GDPR Applies to

The GDPR applies to any business that does one or both of the following:

- Offers products or services to citizens of the EU
- Collects personal information from citizens of the EU

Based on the above premise the GDPR Applies to Abans Global Limited (AGL)

Our Commitment

AGL ('we' or 'us' or 'our') are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection framework in place which complies with existing law and abides by the data protection principles. However, we recognise

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the requirement and importance of updating and expanding this program to meet the demands of the GDPR and the UK's Data Protection Bill.

AGL is dedicated to safeguarding the personal information under our responsibility and to developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation.

AGL Policy Statement

The Board of Directors and management of Abans Global Limited (AGL) are committed to compliance with all relevant EU and Member State laws in respect of personal data, and the protection of the "rights and freedoms" of individuals whose information AGL collects and processes in accordance with the General Data Protection Regulation (GDPR).

AGL's compliance with the GDPR is described by this policy and applies to all of AGL's personal data processing functions, including those performed on customers', clients', employees', suppliers' and partners' personal data, and any other personal data the organisation processes from any source.

This policy applies to all Employees/Staff and interested parties of AGL such as outsourced suppliers. Any breach of the GDPR will be dealt with under AGL's disciplinary policy and may also be a criminal offence, in which case the matter will be reported as soon as possible to the appropriate authorities.

All third parties working with or for AGL, and who have or may have access to personal data, will be expected to have read, understood and to comply with this policy. No third party may access personal data held by AGL without having first entered into a data confidentiality agreement, which imposes on the third party obligations no less onerous than those to which AGL is committed, and which gives AGL the right to audit compliance with the agreement.

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AGL lists six legitimate purposes, and processing of personal data must be linked to one of these.

1) Purpose limitation. Processing of personal data will be limited to the legitimate purpose for which that personal data was originally collected from the data subject. This effectively forbids the processing of personal data outside of the legitimate purpose for which the personal data was collected.

2) Data minimisation. When collecting data, only the personal data absolutely required for that purpose may be requested. This means that no data other than what is necessary can be requested, or stored. This is of significance when AGL is analysing data. It will be important to limit the analysis of data to a set of anonymised data, or to a set of data for which consent has been obtained or there is a clear legitimate processing purpose.

3) Accuracy. Personal data of data subjects must always be accurate and kept up to date. This is simple and straightforward, meaning that controllers are asked to ensure that data is kept accurate, and data subjects can update their data when required.

4) Integrity and confidentiality. Personal data must be processed in a way that ensures appropriate security, including protection against unauthorised or unlawful processing. Also, controllers must ensure that data cannot be modified by unauthorised persons.

5) Storage limitation. Personal data should be retained only while necessary. That is, personal data should be deleted once the legitimate purpose for which it was collected has been fulfilled. This is not simple, and needs to be determined in line with applicable laws that may sometimes require personal data to be retained for a longer period than the originally envisaged processing purpose.

6) Fair and transparent. GDPR asks that all personal data processing should be fair; that is, AGL does not perform processing that is not legitimate. Also, AGL should be transparent regarding the processing of personal data, and inform the data subject in an open and transparent manner. This means that personal data should be processed if, and only if, there is

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a legitimate purpose for the processing of that personal data. EU GDPR requires AGL to practice transparency so that data subjects will be sufficiently informed regarding the processing of their personal data.

What the GDPR Requires

While the Data Protection Directive only applied to data controllers, the GDPR now applies to data processors as well. Data controllers must now conduct Data Privacy Impact Assessments (DPIAs) and add more thorough methods of obtaining consent for collecting data.

Data processors will have to start keeping written records, increasing security measures to protect data and notify data controllers of any breaches that occur with the data.

The GDPR requires that clients of AGL are provided with thorough information about how their personal data is processed.

According to Article 12 of the GDPR, AGL will need to communicate information about how its processes personal data in a way that's:

- Concise
- Transparent
- Intelligible
- Easily accessible
- In clear and plain language
- Free of charge

This can be accomplished with a good Privacy Policy and privacy notices.

Privacy Policy

Through the Privacy Policy AGL will let its users know:

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- What personal information AGL collect's

Customers and employees have more power now to control how AGL uses their data. AGL could be required to report on, move or dispose of personal data if requested and must have the capabilities to do this. The options for using personal data are restricted

- How and why AGL collect it's

AGL must be able to provide individuals with their personal data in a structured, commonly used and machine readable form. AGLs systems and processes will have to let you truly 'forget and delete' data upon request from the individuals including long term archives.

- How AGL will use it

The rules on consent are getting tougher, and individuals can withdraw consent at any time. AGL will be required to articulate all of the ways in which you use personal data, and make it clear to individuals what their data is being used for and who you have shared it with.

- How AGL will secure it

We also take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used.

- Any third parties with access to it

AGL will remain responsible for individuals' personal data throughout the entire data lifecycle. AGL will have to assure that any data passed on to third parties is handled in a manner compliant with GDPR.

What personal information AGL collect's

AGL collects personal information from you which include your name, address, telephone number and E-Mail address, when you enter such information on the website, or when you open an account with AGL.

If you are already a client of AGL, we may also be required to collect other additional information such as your financials and other types of personal information from you in

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accordance with the rules and regulations of our regulator, the Financial Conduct Authority ("FCA").

In addition to the above, if you are an existing client of AGL and you wish to have online access to view statements and other information relating to your account, we will ask you to provide information about yourself for security, identification and verification purposes.

When you visit our site, we may also log your IP address, a unique identifier for your computer or other access device.

How AGL will use it

We will use your personal information for the purposes of providing the services you have requested, for administration and customer services, for credit scoring, for marketing, for research/statistical analysis purposes and to ensure that the content, services and advertising that we offer are tailored to your needs and interests. We may keep your information for a reasonable period for these purposes. We may need to share your information with our service providers and agents for these purposes.

In assessing your application to open an account, to prevent fraud, to check your identity and to prevent money laundering, we may search the files of credit reference agencies who will record any credit searches on your file. The information will be used by other credit grantors for making credit decisions about you and the people with whom you are financially associated, for fraud prevention, money laundering prevention and occasionally for tracing debtors. Information used for these purposes will include publicly available information such as electoral roll, county court judgments, bankruptcy orders or repossessions.

Disclosure to comply with legal and/or regulatory obligations

We may disclose personal data in order to comply with a legal or regulatory obligation.

Information sharing and marketing

We may contact you by mail, telephone, fax, e-mail or other electronic messaging service with offers of services or information that may be of interest to you. By providing us with your fax

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number, telephone numbers or email address you consent to being contacted by these methods for these purposes. If you do not wish to receive marketing information from us, please tick the relevant box.

Using e-mail to send personal information

Any information which we send to you by e-mail will not be encrypted. We cannot guarantee confidentiality of e-mails that you send to us.

Consent to processing your personal information

By providing us with your personal information, you consent to our processing your sensitive personal data, such as criminal convictions, for the above purposes.

Information you provide us on other persons

If you provide us with information about another person, you confirm that they have appointed you to act for them, to consent to the processing of their personal data including sensitive personal data and that you have informed them of our identity and the purposes (as set out above) for which their personal data will be processed.

Keeping your information secure

We also take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used.

You are entitled to ask for a copy of the information we hold about you (for which we may charge a small fee) and to have any inaccuracies in your information corrected.

Recording of communications

For quality control, regulatory and training purposes, we will monitor or record your communications with us.

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Changes to personal details

If your personal details change, if you change your mind about any of your marketing preferences or if you have any queries about how we use your information, please let us know by email: compliance@abansglobal.co.uk. We will update our records when you inform us that your details have changed.

Data Subject Rights

AGL will provide easy to access information of an individual's right to access any personal information that it processes about them and to request information about: -

• What personal data we hold about them
• The purposes of the processing
• The categories of personal data concerned
• The recipients to whom the personal data has/will be disclosed
• How long we intend to store your personal data for
• If we did not collect the data directly from them, information about the source
• The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
• The right to request erasure of personal data (only where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us.
• The right to lodge a complaint or seek judicial remedy and who to contact in such instances.

GDPR Roles and Employees

AGL will have a designated Data Protection Officer (DPO) who will be responsible to implement the new data protection Regulation. The DPO and his team will be responsible for promoting awareness of the GDPR across the organisation and assessing the robustness of our GDPR , identifying any gap areas and mitigating them in addition to implementing the new policies, procedures and measures.

AGL will at all times follows the eight principals as mentioned below
The eight Principles require that personal information:

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1) shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;

2) shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;

3) shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;

4) shall be accurate and, where necessary, kept up to date;

5) shall not be kept for longer than is necessary for the specified purpose(s);

6) shall be processed in accordance with the rights of data subjects under the Act;

7) should be subject to appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of personal data, or the accidental loss, destruction, or damage to personal data;

8) shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

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