

## 1. PRIVACY NOTICE FOR SHAREHOLDERS (TO INCLUDE LEGAL REPRESENTATIVES).

Riversimple, in accordance with the General Data Protection Regulation (GDPR), are committed to ensuring the lawful, fair and transparent processing of all personal data under its control.

In order to engage you as an investor in Riversimple it is necessary for us to obtain and process personal data in accordance with the provisions in this privacy notice.

### 1.1 Who controls and processes your information?

**Data Controller:** Riversimple Movement Ltd and applicable group companies (Riversimple).

**Data Processor:** Riversimple.

### 1.2 The Information we collect:

We collect and process a range of information about you, including:

- Full name;
- Date of birth;
- Nationality;
- Residential address;
- Email address;
- Telephone number (if applicable);
- Occupation (if applicable);
- Name of beneficiary/ies (if applicable);
- Copy of passport (if applicable);
- Copy of utility bill (if applicable);
- Copy of driving licence (if applicable);
- Details of the trust (if applicable); and
- Details of the company (if applicable).

### 1.3 How we collect your information:

We collect information through a number of means, including:

- Email;
- Phone;
- Contact form on our website;
- Post; and
- In person.

In some cases, for enhanced due diligence, we may collect information about you from third parties, such as, background check providers or credit reference agencies.

### 1.4 Why we process your information (the Purpose):

**(A)** To **communicate with you** about:

- Business performance, developments and updates;
- Events;
- Share price/ value;
- Shareholder benefits & rewards;
- Dividends;
- Transfer of funds; and
- Financial promotion (in accordance with regulation).

**(B)** To meet our **regulatory requirements** in relation to:

- Companies Act 2006;
- Criminal Finances Act 2017; and
- Money Laundering Regulation 2017.

**(C)** To **support our growth** through vital commercial activities, including:

- Crowdfunding.

### 1.5 The Lawful Basis for which we process your information:

For 1.4 (A) the lawful basis is:

**The performance of a contract** (Article 6(1)(b) of the General Data Protection Regulation).

As a Shareholder we have a contract (implied or actual i.e Shareholder Agreement) with you and we need to process your information to comply with obligations under that contract.

For 1.4 (B) the lawful basis is:

**Compliance with a legal obligation** (Article 6(1)(c) of the General Data Protection Regulation).

Riversimple is obliged to process your information in order to comply with the law to which we are subject.

For 1.4 (C) the lawful basis is:

Processing is necessary for the **legitimate interests** pursued by the Data Controller (Article 6(1)(f) of the General Data Protection Regulation).

Riversimple complies with the three-part test for reliance on the legitimate interest basis. Namely, that it is legitimate, necessary and balanced against your individual interests, rights and freedoms.

### **1.6 Who has access to your information:**

Your information will be shared internally where appropriate, and in line with 1.8.

We use a number of trusted third parties to provide us with necessary services to run our business, and who may process your information on our behalf:

- Google - Email and data storage provider;
- Mailchimp - Mailing list processing service provider;

- We are the Missing Link - Web developer & hosting provider; and
- Seedrs - Crowdfunding platform.

We may also share your details with third parties in the context of a sale of some or all of the business. In those circumstances your information will be subject to confidentiality agreements.

### **1.7 How your information is used:**

Your information is only used for the Purpose(s) defined in 1.4, in accordance with the lawful basis detailed in 1.5.

### **1.8 How we secure your information:**

We take appropriate technical and operational measures to ensure that your information is managed carefully and appropriately and to protect against unlawful or unauthorised use and accidental loss or destruction, including:

- Only providing access to those who need access to carry out the Purpose;
- Passwords are protected and, wherever possible, two-factor authentication is employed for extra protection;
- Our file storage provider uses encrypted sessions to protect files as they are uploaded and downloaded; and
- Hard-copy information is stored securely in locked cabinets with access limited to only those who need to have access to carry out the Purpose.

### **1.9 Data Transfers:**

**(A)** Transfers within the European Economic Area:

Companies House - Registrar of companies in the UK - In compliance with our obligations under the Companies Act 2006.

Seedrs - Crowdfunding Platform in the UK - as a legitimate commercial interest to grow the business.

**(B)** Transferring of your information outside the European Economic Area:

Information you submit to us is stored on our third party cloud-based data storage and email provider's servers.

Country: United States of America  
Safeguard(s) used: our email and cloud-base provider is self certified under the EU-US privacy shield scheme.

### **1.10 How long we will hold onto your information:**

For 1.4 (A) we hold on to your personal information for as long as you remain a shareholder in Riversimple.

For 1.4(B), in line with our legal requirements, we hold on to any personal information relating to a particular transaction for five years after the date the transaction is completed. Supporting records are kept for five years after you stop being a Shareholder.

For 1.4(C) we hold on to any personal information for only as long as is necessary for the legitimate interest and no longer.

### **1.11 Your rights in relation to your information:**

**(A)** You have the right to **object to the processing** of your information, or to **request that we restrict** how your

information is processed. We are obliged to comply with such requests unless there is a legitimate basis for not doing so.

Please contact [gdpr@riversimple.com](mailto:gdpr@riversimple.com) to register any objections to or request any restrictions of processing.

**(B) Access requests** - you may request that we supply all the information we hold about you, at any time. We will endeavour to respond with such information within 30 days. There is no charge for this, except where such requests are clearly unreasonable, in which case a fee of £10 may be charged. We may require proof of ID to ensure such information is not disclosed to persons other than those to which the information pertains. Please contact [gdpr@riversimple.com](mailto:gdpr@riversimple.com) if you wish to make an access request.

**(C)** If you feel your information has not been processed in a lawful, fair or transparent manner you have the right to lodge a complaint with the Information Commissioner's Office. Their website can be accessed at [www.ico.org.uk](http://www.ico.org.uk) and concerns may be reported at <https://ico.org.uk/concerns/>.

### **1.12 What happens if your information is compromised?**

In the event we discover a breach in the way we handled your personal information, we will notify the Information Commissioner's Office within 72 hours of discovery. Where we consider there to be any risk to you as a consequence of the breach we will notify you immediately with details of any resulting risks and measures we have taken or intend to take, and any recommended actions that may help you.

### **1.13 Sensitive Personal Information:**

We do not hold sensitive personal information on Shareholders.