

2. PRIVACY NOTICE FOR POTENTIAL INVESTORS (TO INCLUDE OPTION HOLDERS).

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 a potential investor in Riversimple it is necessary for us to obtain and process personal data in accordance with the provisions in this privacy notice.

2.1 Who controls and processes your information?

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

Data Processor: Riversimple.

2.2 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); and
- Occupation (if applicable).

2.3 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.

2.4 Why we process your information (the Purpose):

(A) To communicate with you about:

- Business performance, developments and updates;
- Events;
- Share price/ value; and
- Financial promotion (in accordance with regulation).

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

- Crowdfunding.

2.5 The Lawful Basis for which we process your information:

For 2.4 (A) and 2.4 (B) 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.

2.6 Who has access to your information:

Your information will be shared internally where appropriate, and in line with 2.8.

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;
- Seedrs - Crowdfunding platform.

2.7 How your information is used:

Your information is only used for the Purpose(s) defined in 2.4, in accordance with the lawful basis detailed in 2.5.

2.8 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.

2.9 Data Transfers:

(A) Transfers within the European Economic Area

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.

2.10 How long we will hold onto your information

For 2.4 (A) & 2.4 (B) we hold on to any personal information for only as long as is necessary for the legitimate interest and no longer.

2.11 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 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 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 and concerns may be reported at <https://ico.org.uk/concerns/>.

2.12 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.

2.13 Sensitive Personal Information

We do not hold sensitive personal information on Potential Investors.