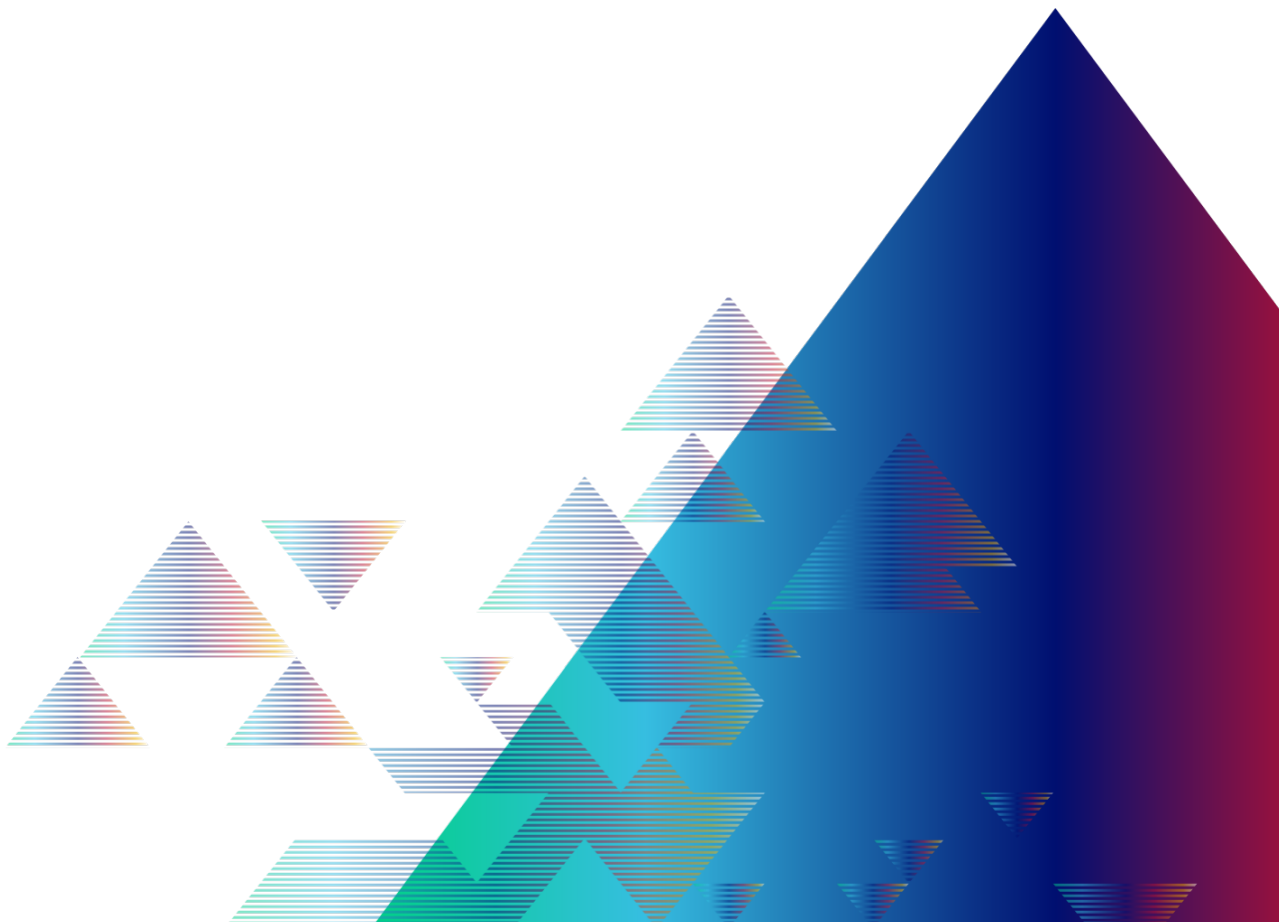




Privacy Policy

Last updated March 7, 2019



Contents

1. Definitions and Interpretation	3
2. Data Collected.....	3
3. Data Storage and Security	4
4. Use of Data	4
5. Your Rights to Withhold Information.....	5
6. Third Party Web Sites and Services.....	6
7. Data processed outside the European Union	6
8. Changes of Business Ownership and Control.....	6
9. Child control and protection.....	7
10. Cookies	7
11. Retention Period for Personal Data.....	7
12. Changes to this Policy.....	8

The company's legal business name is AltFi Data Limited. The trade name or doing business as name is Brismo following a rebranding.

1. Definitions and Interpretation

This privacy policy aims to inform you about how Brismo collects and processes any information collected or provided from you. It covers information that could identify you (“personal information”) and information that could not. It tells you about your privacy rights and how the law protects you.

In this Policy the capitalised terms shall have the same meanings as in the Brismo Terms and Conditions. In the context of the law and this notice, “**process**” means collect, store, transfer, use or otherwise act on information. In addition the following terms shall have the following meanings:

“**Cookie**” means a small file placed on your computer by Brismo when you visit certain parts of this Web Site. This allows us to identify recurring visitors, to analyse their browsing habits within the Web Site. Where e-commerce facilities are provided, Cookies may be used to store information about your subscription. Further details are contained in Clause 12 of this Policy;

“**Data**” means collectively all information that you submit to the Web Site or to Brismo. This includes, but is not limited to, Account details and information submitted using any of our Services or Systems; and

“**System**” means any online communications infrastructure that Brismo makes available through the Web Site either now or in the future. This includes, but is not limited to, web-based email, message boards, live chat facilities and email links.

2. Data Collected

Visiting our Web Site does not require any form of registration, allowing you to visit our site without telling us who you are. However, some services may require you to provide us with Personal Data.

Without limitation, any of the following Data may be collected:

2.1 name and title;

2.2 job title;

2.3 profession;

2.4 contact information such as email addresses, fax numbers, telephone numbers and mailing addresses;

2.5 financial data (bank account, payment card details or PayPal);

2.6 transaction data includes details about payments or communications to and from you and information about products and services you have purchased from Brismo.

2.6.2 Payment information is never taken by Brismo. Its employees and contractors never have access to it.

2.6.3 At the point of payment, you are transferred to a secure page on the website of PayPal. That page may be branded to look like a page on our website, but it is not controlled by Brismo.

2.7 IP address (automatically collected);

2.8 web browser type and version (automatically collected);

2.9 operating system (automatically collected);

2.10 a list of URLs starting with a referring site, your activity on this Web Site, and the site you exit to (automatically collected);

2.11 client profile includes information such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;

2.12 cookie information (see clause 10 below).

3. Data Storage and Security

3.1 Our Site is owned and operated by Altfi Data Limited

3.2 Our Data Protection Officer is Senthil Kumarathevan. He can be contacted on senthil@brismo.com

3.3 Brismo is committed to doing all that the necessary to keep your data secure. Brismo has set up systems and processes to prevent unauthorised access or disclosure of your data.

4. Use of Data

4.1 Any personal Data you submit will be retained by Brismo for as long as you use the Services and Systems provided on the Web Site. Data that you may submit through any communications System that we may provide may be retained for a longer period.

4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 4, your Data will not be disclosed to third parties. This does not include our affiliates and/or sub-contractors and/or other companies within our group.

4.3 All personal Data is stored securely in accordance with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR). For more details on security, see clause 3 above.

4.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Web Site. Specifically, Data may be used by us for the following reasons:

4.4.1 internal record keeping, including billing;

4.4.2 improvement of our products / services;

4.4.3 customisation of our products / services;

4.4.4 transmission by email, telephone, fax or mail of promotional materials or other information that may be of interest to you; and

4.4.5 contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Web Site.

4.5 Brismo may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity. However, if Brismo combines or connects aggregated data with your personal information so that it can identify you in any way, the combined data will be considered as personal information and it will be used in accordance with this privacy policy.

5. Your Rights to Withhold Information

5.1 You may access certain areas of the Web Site without providing any Data at all. However, to use all Services and Systems available on the Web Site you may be required to submit Account information or other Data.

5.2 You may restrict your internet browser's use of Cookies. For more information see clause 12.4 below.

5.3 You have the following data protection rights:

You may access your Account to view or amend the Data. You may need to modify or update your Data if your circumstances change. Additional Data as to your marketing preferences may also be stored and you may change this at any time.

5.3.1 If you wish to request access to, or correction, updating or deletion of, your personal information, you can do so at any time by contacting Brismo.

5.3.2 In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of

your personal information. Again, you can exercise these rights by contacting us at Brismo at 7 Castle Street, Tonbridge, Kent, England, TN9 1BH.

- 5.3.3 You have the right to opt-out of marketing communications Brismo sends you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. You may also update your email preferences to choose the types of emails you receive. To opt-out of other forms of marketing (such as postal marketing), then please contact us.
- 5.3.4 Similarly, if Brismo has collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing Brismo conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- 5.3.5 You have the right to complain to a data protection authority about Brismo’s collection and use of your personal information, though we would ask that you try to solve any issue with us directly first.

6. Third Party Web Sites and Services

Brismo may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment handling, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services may have access to certain personal Data provided by Users of this Web Site. Any Data used by such parties is used only to the extent required by them to perform the services that Brismo requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties must be processed within the terms of this Policy and in accordance with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

7. Data processed outside the European Union

7.1 Brismo websites are hosted in the UK.

7.2 Brismo may use outsourced services in countries outside the European Union from time to time in other aspects of its business.

7.3 Accordingly data obtained within the UK or any other country could be processed outside the European Union.

8. Changes of Business Ownership and Control

8.1 Brismo may, from time to time, expand or reduce its business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by Users will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.

8.2 In the event that any Data submitted by Users will be transferred in such a manner, you will not be contacted in advance and informed of the change.

9. Child control and protection

9.1 Brismo do not sell products or provide services for purchase by children, nor do we market to children.

9.2 If you are under 18, you may use our website only with consent from a parent or guardian.

10. Cookies

10.1 Brismo may set and access Cookies on your computer.

10.2 A Cookie is a small file that resides on your computer's hard drive and often contains an anonymous unique identifier and is accessible only by the web site that placed it there, not any other sites.

10.3 You may delete Cookies, however you may lose any information that enables you to access the Web Site more quickly.

10.4 You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. For further details please consult our Cookie Notice (https://brismo.com/wp-content/uploads/Policies/BRISMO_Cookies_Policy.pdf). Disabling Cookies may prevent you from using the full range of Services available on the Web Site.

11. Retention Period for Personal Data

11.1 Except as otherwise mentioned in this privacy policy, Brismo shall keep your personal information for as long as required:

11.2 to provide you with the services you have requested;

11.3 to comply with other law, including for the period demanded by our tax authorities;

11.4 to support a claim or defence in court.

12. Changes to this Policy

We may change this privacy policy. In that case, the 'last updated' date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately.

If these changes affect how your personal data is processed, we will take reasonable steps to let you know.