

Data Protection Policy

1. Introduction

At Lifefix, we are committed to protecting the privacy and security of the personal data of our investors. This Data Protection Policy outlines how we handle, store, and process investor data in compliance with the requirements set forth by the Information Commissioner's Office (ICO) and relevant data protection legislation.

2. Scope

This policy applies to all employees, contractors, and third parties who handle investor data on behalf of Lifefix Ltd. It covers all forms of personal data, whether processed electronically or manually, and includes data collected from investors, both online and offline.

3. Principles of Data Protection

Lifefix Ltd adheres to the following principles when handling investor data:

3.1. Lawfulness, Fairness, and Transparency: We process personal data lawfully, fairly, and in a transparent manner. We provide clear and concise information to investors about how their data is collected, used, and stored.

3.2. Purpose Limitation: We collect and process personal data only for specified and legitimate purposes. Data is not further processed in a manner incompatible with these purposes.

3.3. Data Minimization: We collect and process only the minimum amount of personal data necessary for the intended purposes.

3.4. Accuracy: We ensure that personal data is accurate, up-to-date, and relevant. We take reasonable steps to rectify or erase inaccurate or incomplete data.

3.5. Storage Limitation: We retain personal data for no longer than necessary to fulfill the purposes for which it was collected, taking into account any legal or regulatory requirements.

3.6. Integrity and Confidentiality: We implement appropriate technical and organizational measures to ensure the security and confidentiality of personal data, protecting it against unauthorized access, loss, destruction, or alteration.

3.7. Accountability: We are accountable for our data protection practices, ensuring compliance with applicable laws and regulations. We maintain records of our data processing activities.

4. Collection and Use of Investor Data

4.1. Data Collection: We collect personal data from investors for the purpose of providing our deal packaging services. This may include, but is not limited to, names, contact details, financial information, and any other information required for investment purposes.

4.2. Legal Basis: We rely on one or more legal bases, such as the performance of a contract, compliance with a legal obligation, or the legitimate interests pursued by Lifefix Ltd, to lawfully process investor data.

4.3. Data Use: Investor data is used solely for the purpose of fulfilling our contractual obligations, managing investor accounts, and communicating relevant investment-related information. We do not use investor data for marketing purposes without explicit consent.

5. Investor Data Storage and Security

5.1. Data Storage: Investor data is stored securely in electronic and/or physical formats, using industry-standard security measures to protect against unauthorized access, loss, or theft. We maintain appropriate technical and organizational safeguards to ensure the confidentiality, integrity, and availability of investor data.

5.2. Third-Party Processors: In some cases, we may engage third-party processors to handle investor data on our behalf. We ensure that these processors comply with applicable data protection laws and have adequate security measures in place.

5.3. Data Transfer: If personal data is transferred outside of the European Economic Area (EEA), we ensure that appropriate safeguards are in place, such as utilizing standard contractual clauses or relying on the adequacy decisions made by the European Commission.

5.4. Data Breach Response: In the event of a data breach involving investor data, we have procedures in place to respond promptly and effectively. We will notify affected individuals and the ICO, as required by law.

6. Investor Rights

6.1. Data Subject Rights: We respect the rights of investors regarding their personal data, including the rights to access, rectify, erase, restrict processing, object to processing, and data portability. We provide mechanisms to exercise these rights and respond to requests in a timely manner.

7. Training and Compliance

7.1. Training: We provide regular training to employees and contractors on data protection principles, best practices, and their obligations under this policy.

7.2. Compliance Monitoring: We monitor compliance with this policy through audits, assessments, and reviews. Any suspected breaches of this policy or data protection laws should be reported immediately to the designated data protection officer.

8. Review and Update

This Data Protection Policy will be reviewed and updated as necessary to ensure ongoing compliance with ICO requirements and any changes in relevant data protection legislation.