



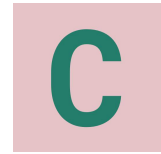
COCOA
INVEST

Privacy Policy Document

Version 2020.1 (Effective from 01 September 2020)



Privacy Policy



Your privacy is very important to us. So we've developed a Privacy Policy that covers how we collect, use, disclose, and store your personal information. Please take a moment to read through this policy and let us know if you have any questions.

By visiting www.cocoainvest.com you are accepting this policy.

COCOA ASSET MANAGEMENT W.L.L ("COCOA", "we", "us" or "our") is a Data Controller for the purpose of the General Data Protection Regulation. If you have any questions regarding how we manage your data, please contact us at info@cocoainvest.com.

What data we collect and why

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

COCOA collects your personal data directly from you and from third parties. In all cases COCOA must have a valid basis to process your personal information.

There are 6 'lawful bases' under the data protection laws, of which 4 are relevant for your personal data and COCOA. These are:

- Consent – you agree to allow us to control or use this data
- Contract – processing is necessary for the contract between you and COCOA
- Legal obligation – processing is necessary to comply with the law
- Legitimate Interest - when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is

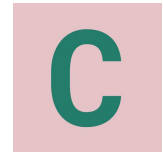
We rely on a legitimate interest to send you direct marketing communications via, but not limited to, email or text messages. You have the right to object to receiving such communications by clicking 'unsubscribe' in any marketing email we may send. Alternatively, you can contact our customer service team via online chat or secure messaging within the COCOA application. You are also able to change or remove your preferences via your online dashboard within the profile section of the COCOA mobile application.

Information you give us

You may give us personal information about you by filling in forms on our website www.cocoainvest.com (our "Site") or by corresponding with us by phone, e-mail, post or instant chat. You may also provide personal information when you register to use our Site; subscribe to our services; enter a competition promotion or survey; and when you report a problem with our Site.

The information you give us may include your name, address, e-mail address and phone number, financial information, personal description, photograph, and other information, which may be considered personal in that it may be used to identify you.

By completing any of our forms on our Site you are signifying your explicit consent to COCOA collecting such information.



It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Information we collect about you

When you visit our Site we may automatically collect the following personal information:

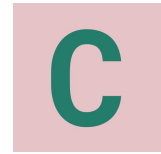
Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We collect this personal data by using cookies, and other similar technologies. Please see our Cookie Policy for further details.

Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

We do not knowingly collect data relating to children.

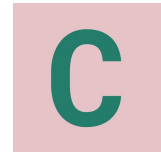
Information we receive from other sources

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, lead generation agencies) and may receive personal information about you from them.



How we use your personal information

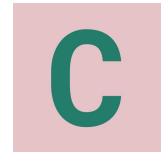
What we use personal information for	Type of personal information	Our reasons
<ul style="list-style-type: none"> • To offer you a suitable investment portfolio • To detect, investigate, report, and seek to prevent financial crime • To manage risk for us and our customers • To obey laws and regulations that apply to us • To respond to complaints and seek to resolve them 	<ul style="list-style-type: none"> • Financial • Contact • Personal • Socio demographic • Transactional • Contractual • Behavioural • Communications • Social relationships • Documentary data • Special types of data • National identifier 	<ul style="list-style-type: none"> • Legal Obligation • Contract
<ul style="list-style-type: none"> • To develop and carry out marketing activities • To make special offers to you • To market new products that may be of interest to you • To develop new ways to meet our customers' needs and to grow our business • To enable you to partake in a prize draw, competition or complete a survey • To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you • Logging feedback and comments from our customers 	<ul style="list-style-type: none"> • Personal • Transactional • Contractual • Behavioural • Communications • Technical 	<ul style="list-style-type: none"> • Legitimate interests - commercial interests in acquiring customers or promoting the COCOA service
<ul style="list-style-type: none"> • To register you as a new customer • To deliver our products and services • To make and manage customer payments • To manage fees, charges and interest due on customer accounts • To collect and recover money that is owed to us • To manage and provide investment products and services • To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) 	<ul style="list-style-type: none"> • Financial • Contact • Personal • Socio demographic • Transactional • Contractual • Behavioural • Communications • Social relationships • Documentary data • National identifier 	<ul style="list-style-type: none"> • Legal obligations • Contract • Consent • Legitimate interest - Contacting customers for promotions of new products they may want to hear about in future



Groups of Personal Information

We use different kinds of personal information, and we group them like this:

Type of personal information	Description
Financial	Your financial situation including but not limited to details of income, debts and savings.
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality and where you fit into general social or income groupings.
Transactional	Details about payments to and from your accounts with us.
Contractual	Details about the products or services we provide to you.
Locational	Data we get about where you are, such as may come from your mobile phone or the address where you connect a computer to the internet.
Behavioural	Details about how you use our products and services.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails and conversations between us.
Special Category Data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so. Things like:</p> <ul style="list-style-type: none">• Racial or ethnic origin• Genetic and bio-metric data• Health data including gender• Criminal convictions and offences• Criminal records of convictions and offences• Religious, political or philosophical beliefs
Social Relationships	Such as your marital status.
Open Data and Public Records	Details about you that are in public records, such as the Electoral Register, and information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or birth certificate.



Preferences	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Identity number.

Sometimes we may collect and use particularly sensitive personal information that requires higher levels of protection such as information on political affiliations and/or criminal convictions. This is known as "special category data". We need to be able to collect, store and use this type of personal information for the services we provide.

We can only collect and use sensitive personal information in limited circumstances, where we've obtained your explicit consent, where we need this information to deliver our products and services to you or where we have another legal basis for doing so as explained in this privacy policy.

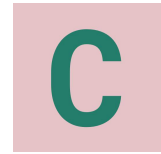
We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Who we share your personal information with

To provide you with products and services we share your personal data with the following organisations:

- Onfido, who we use to verify your identify and address, and to help combat financial crime
- 3rd parties that introduce you to us
- 3rd parties we have integrated with and you have given us permission to share data with
- Messaging service companies (MailChimp)
- Companies you ask us to share your data with
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others
- Analytics and search engine providers that assist us in the improvement and optimisation of our Site such as Google Analytics
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If COCOA or its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions, and other agreements; or to protect the rights, property, or safety of COCOA, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



Automated Decision Making

COCOA use's various systems to make automated decisions about you when signing up. This is to ensure we are operating in line with relevant regulations and laws on how we conduct our business. We use automated decision making in assessing your suitability to invest with COCOA, and when completing background checks before accepting you as a customer.

How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax purposes, and we may also use such data to enable us to respond to any future complaints, or to share information with the relevant financial regulator present in each region we operate.

Your rights

Right of access

Commonly known as a "data subject access request" – this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Please send any requests to info@cocoainvest.com.

Right to rectification

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it. You can contact us about this at info@cocoainvest.com.

Right to be forgotten

You have the right to request deletion or removal of personal data where there is no compelling reason for its continued processing. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. There may be legal or other official reasons why we need to keep or use your data and we will notify you if any of these reasons are applicable in response to your request. But please tell us if you think that we should not be using it.

Right to portability

You have the right to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy, or transfer personal data in a safe and secure way from one IT environment to another.

Right to object



The right to object exists where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Right to restrict processing

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Right to withdraw consent:

This right exists where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Please be aware that if you withdraw your consent, we may not be able to provide certain products or services to you. If this is the case, we will tell you.

Storing and protecting your personal data

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

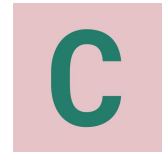
We use a secure server. All supplied sensitive information is transmitted via Secure Socket Layer (SSL) technology only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will only send your data outside of the region where we are regulated to:

- Follow your instructions
- Comply with a legal duty
- Work with our suppliers who help us to run your accounts and services

If we do transfer your personal information to our suppliers, we will make sure that it is protected to the same extent.



How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us using by email info@cocoainvest.com.

You also have the right to complain at any time to the Information Commissioner's Office. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.