

# Expana Privacy Policy

Updated June 2024

This Privacy Policy explains how we collect, use, process, disclose, transfer, and store any personal information that we collect from you or that you provide to us. If you do not agree with this Privacy Policy please do not use our website or services.

The website and the Mintec Analytics platform is owned and managed by Mintec Limited, a company incorporated and registered in England and Wales with company number 02138301 whose registered office is at Unit Q, Gloucester House, Bourne End Business Park, Cores End Road, Bourne End SL8 5AS, UK. Expana is a group of companies which is made up of different legal entities, including Mintec Limited, Urner Barry Publications Inc., Tropical Research Services Limited, Strategiegrains and Feedinfo. Details can made available upon request. This privacy policy is issued on behalf of the Group so when we mention “**Expana**”, “**we**”, “**us**” or “**our**” in this privacy policy, we are referring to the relevant company in the Group responsible for processing your data.

The website and the Mintec Analytics platform is not intended for children and we do not knowingly collect data relating to children.

## What personal information we collect

When you contact us through the website, correspond with us or otherwise use our services, Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity data includes names, usernames or similar identifier, title.
- Contact data includes billing address, delivery address, email address and telephone numbers.
- Financial data includes bank account and payment card details.
- Transaction data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- Profile data includes your username and password, website or platform preferences, feedback and survey responses.

- Usage data includes information about how you interact with and use our website, products and services.
- Marketing and communications data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

#### How your personal data is collected

We may use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you interact with our website or the relevant Expana platform.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- **Identity and contact data** may be collected from data brokers or aggregators from time to time.

#### How we use your personal information

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

We use your personal information to respond to your enquiries, operate the website, provide services via our Expana platforms and pursue breaches of the acceptable use and other policies. We may also use the information to develop, deliver, and improve our products and services and for internal purposes such as auditing, data analysis and research.

We also use your personal information to keep you updated on our latest service announcements, upcoming events and to improve our services, content and advertising. If you do not want to be included on our mailing list, you can opt out at any time by emailing us at [legal@expanamarkets.com](mailto:legal@expanamarkets.com).

#### International transfers

We may share your personal data within our Group. This will involve transferring your data outside the UK to our overseas offices in Denmark, France and the US.

Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

We use specific standard contractual terms approved for use in the UK and the EU which give the transferred personal data the same protection as it has in the UK and the EU, namely the International Data Transfer Agreement. To obtain a copy of these contractual safeguards, please contact us at [legal@expanamarkets.com](mailto:legal@expanamarkets.com).

#### Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website by virtue of the unsecure nature of the internet and any transmission is at your own risk.

#### Retention period

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other 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.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### Cookies

Our website uses cookies to distinguish you from other users. You can find our Cookie policy at <https://www.expana.com/cookie-policy>

### Disclosure to Third Parties

We may share your personal information with members of our corporate group, which means our subsidiaries, our ultimate holding company and its parent and subsidiaries.

We may disclose your personal information to third parties:

- 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 our company, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our 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 our any terms applicable to the use of our services or our Acceptable Use Policy [https://www.expanamarkets.com/Acceptable\\_Use\\_Policy.pdf](https://www.expanamarkets.com/Acceptable_Use_Policy.pdf); or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information.

Our website or the relevant Expana platforms or services may include links to third-party websites, plugins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### EU Data Protection Representative

Mintec Limited has appointed Mintec SAS, as the representative for data protection matters for companies that are established in the EU. Please contact Mintec SAS on any matters related to the processing of Personal Data using this email: [legal@expanamarkets.com](mailto:legal@expanamarkets.com).

### Your rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "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.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a

third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time 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. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - 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
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us at [legal@expanamarkets.com](mailto:legal@expanamarkets.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### Privacy Policy Changes

Our Privacy Policy may change from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, if appropriate, by email).

Questions or comments

To contact us, please email: [legal@expanamarkets.com](mailto:legal@expanamarkets.com)