

Privacy Notice

1. Overview

All personal information processed in connection with this Privacy Notice (the “Privacy Notice”) is controlled by Delio Ltd, a company registered in England and Wales under company number 09092423, and Ventura Group Holding Limited a company registered in England and Wales under company number 11614451 (from now on “we”, “our” or “us”). Our registered offices are at 29 Windsor Place, Cardiff, Wales, CF10 3BZ and 9 Chesterfield Street, Mayfair, London, W1J 5JJ, respectively. We are “joint data controllers” for the purposes of the Data Protection Act 1998 (“DPA”), the UK General Data Protection Regulation (“GDPR”) and, where relevant, the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of your personal information.

By “personal information” we mean all information that identifies or may identify you.

2. Purpose

We are committed to protecting and respecting your privacy. We collect, store and use personal information in accordance with all laws in any relevant jurisdiction that relate to data protection, privacy, the use of information relating to individuals, and/or the information rights of individuals including, without limitation, the DPA and any other laws in force from time to time which implement GDPR, and the equivalent in any other relevant jurisdictions all as amended or replaced from time to time.

This Privacy Notice applies to all personal information we gather or use in connection with your relationship with us as a user of our investment platform, portal.ventura.ae (from now on referred to as our “Platform”) and when you interact with us. We will only use your personal information in accordance with this Privacy Notice.

This Privacy Notice should be read together with the Terms of Service posted elsewhere on our Platform.

Please review this Privacy Notice carefully as it contains important information on:

- the personal information we collect about you;
- what we do with your information; and
- who your information might be shared with.

By using our Platform and by providing any personal information to us, you acknowledge our use of your personal information as set out in this Privacy Notice. Please do not provide us with any personal information if you do not want that information to be used by us in this manner.

3. Your Privacy Rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact our Data Protection Officer at DPO@deliowealth.com or by post to the Data Protection Officer, Delio Ltd, 29 Windsor Place, Cardiff, Wales, CF10 3BZ.

The following rights apply:

Access to your personal information: You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision-making. Please make all requests for access in writing and provide us with evidence of your identity.

Right to object: You can object to our processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

Consent: If you have given us your consent to use personal information, you can withdraw your consent at any time.

Rectification: You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure: You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability: You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction: You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

No automated-decision making: Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

You can make a complaint to us by contacting the Data Protection Officer or to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>.

4. How We Collect and Receive Personal Information

We may collect and/or receive personal information from you when you:

- fill in forms on our Platform, including when you register, create or modify an online account with us;
- communicate with us, such as by e-mail, telephone or through our Platform;
- access our Platform, including where you perform actions, such as expressing an interest in an investment opportunity; or
- respond to surveys or questionnaires we ask you to complete.

We may also collect your personal information from publicly available information such as information on third party websites or from our business partners. Such examples may include the details of any criminal convictions or court orders that we identify via our anti-money laundering checks.

5. Types of Personal Information

The types of personal information we receive, store and use may include:

- your title, name, address, telephone numbers and email address;
- your account information (including your username and password);
- information about your investment preferences;

- information about interactions you may have with us and our staff, including interactions via e-mail, telephone or through our Platform; and
- information regarding your experiences with our Platform, and contact preferences in order to provide you with support in your use of our Platform.

Additionally, we automatically collect the following information when you visit our Platform:

- 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; and
- Information about your visit, including the full Uniform Resource Locators (portal.ventura.ae and time); 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.

We use this automatically collected information to maintain and improve our services and our Platform.

6. Use of Personal Information and Legal Bases

We use the personal information to help us understand your needs, to help us provide you with access to our Platform and to meet our legal and regulatory obligations. In particular, we collect, store and process your personal information for the following reasons and legal bases set out below:

Purpose: To provide access to our Platform and for purposes related to providing you with access to our Platform;

Legal Basis: Performance of a contract with you.

Purpose: To improve and tailor our Platform;

Legal Basis: Necessary for our legitimate interests (administration).

Purpose: For our own internal record-keeping requirements;

Legal Basis: Necessary for our legitimate interests (administration).

Purpose: To protect your account and prevent unauthorised access to your account;

Legal Basis: Necessary for our legitimate interests (security and to prevent fraud).

Purpose: To contact you, for example, to send service communications through our Platform such as to inform you of a modification in Platform functionality; and

Legal Basis: Necessary for our legitimate interests (to help you use our Platform).

Purpose: To meet our legal and regulatory obligations.

Legal Basis: Necessary to comply with a legal obligation.

Sometimes where we ask for personal information necessary to enter into a contract with you (for example, your name) or to meet a legal obligation, we will not be able to provide our products or services without that personal information.

7. Sharing Personal Information

When providing you with our Platform services, we will disclose personal information we collect or receive:

- to you or those acting on your behalf; and
- to third parties to provide a service to, or perform a function for, us or you or who are otherwise appointed by us in connection with the services we offer you including those who are acting as our agent or sub-contractor, including, without limitation, data processing service providers and our legal and professional advisors.

We may also disclose personal information more occasionally, for example:

- to third parties in connection with a proposed or actual financing, insuring, merger, restructure, sale, acquisition, assignment or other disposal of all or part of our business or to anyone whom we may transfer our rights and/or obligations for the purposes of evaluating and performing the proposed transaction; and
- to third parties, including law enforcement officials, law courts and government and regulatory authorities: (a) if we believe disclosure is required by any applicable law, regulation or legal process (such as to respond to subpoenas or judicial orders); or (b) to protect and defend our rights, or the rights or safety of third parties, including to defend against legal claims.

8. Statistical Information

We may aggregate information about you with information about other users of our Platform to create statistical data about users.

9. Data Storage

We will take all steps reasonably necessary to keep your data secure. You should be aware that the transmission of information via the internet is not entirely secure and

we cannot guarantee the security of any data you transmit to our Platform via the internet.

We will generally retain your personal information for seven years unless we are required by law to retain your personal information for a longer period.

10. Transfers of Your Personal Information Out of The EEA

Any transfer of your data outside the European Economic Area will be subject to a European Commission approved contract that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

11. Cookies

Cookies are small files placed on your device when you visit our Platform. We use cookies to recognise you and your preferences, improve the performance of our Platform and to create statistical data.

We use cookies on our Platform to:

- recognise you whenever you visit our Platform;
- carry out research and statistical analysis to help improve our content, products and services and to help us better understand our customer requirements and interests; and
- make your online experience more efficient and enjoyable.

We alert you to our use of cookies. If you use our Platform after this alert, we will assume that you consent to our use of cookies for the purposes described in this Privacy Notice.

Description of cookies:

The table below provides some information on the cookies which we use on our Platform or our Websites:

Cookie Name: AWSELB

What it does: Elastic Load Balancing (ELB) is a load-balancing service for Amazon Web Services (AWS) deployments. ELB automatically distributes incoming application traffic and scales resources to meet traffic demands.

Why is it used: Used for sticky sessions

How long it lasts: Until your session ends

Cookie Name: PHPSESSID

What it does: This is a session ID for when someone interacts with the Delio backend, each time a user logs onto the platform they're assigned this.

Why is it used: Reference to your active session

How long it lasts: Until you session ends

Turning off cookies:

If you do not want to accept cookies, please be aware that you may lose some of the functionality of our Platform. If you wish to continue to use the Platform however, do not accept cookies please contact us at team@deliowealth.com.

12. Third Party Links

Our Platform may contain links to enable you to visit third-party websites, mobile sites and mobile applications. Please note that we do not have any control over these third-party websites, mobile sites or mobile applications. Therefore, we are not responsible for the protection and privacy of any information that you provide whilst visiting such sites. Such sites are governed by their own privacy policies and not this Privacy Notice.

13. Contact Us

If you have any questions or comments on this policy or you would like to request a copy of your personal information, you can contact our Data Protection Officer at us at: DPO@deliowealth.com.

Post: Data Protection Officer, Delio Ltd, 29 Windsor Place, Cardiff, Wales, CF10 3BZ

14. Changes to This Privacy Notice

We may change this Privacy Notice from time to time. You should check this Privacy Notice occasionally to ensure that you are aware of the most recent version that will apply each time you access our websites.

Where we have made any changes to this Privacy Notice which affects the manner in which we use your personal information, we will notify you of this change.

I agree

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