



# Gemba Finance Privacy Policy

# GEMBA FINANCE PRIVACY POLICY

WE ARE COMMITTED TO SAFEGUARDING THE PRIVACY OF OUR WEBSITE VISITORS. OUR PRIVACY POLICY IS SET OUT BELOW AND EXPLAINS HOW WE WILL TREAT YOUR PERSONAL INFORMATION. NOTHING IN THIS PRIVACY POLICY SHALL LIMIT YOUR STATUTORY RIGHTS IN RELATION TO YOUR PERSONAL DATA.

BY PROVIDING PERSONAL DATA TO US VIA OUR WEBSITE AT [HTTP://WWW.GE.MBA/](http://www.ge.mba/)(OUR "SITE"), YOU CONSENT TO OUR PROCESSING OF YOUR DATA IN ACCORDANCE WITH THIS POLICY AND OTHER AGREEMENTS. IF YOU DO NOT AGREE TO THE TERMS SET OUT IN THIS PRIVACY POLICY, PLEASE DO NOT CONTINUE TO USE OUR SITE.

## WHO WILL HOLD YOUR INFORMATION

YOUR INFORMATION WILL BE HELD BY GEMBA FINANCE LTD, REGISTERED IN UNITED KINGDOM OF GREAT BRITAIN UNDER REGISTRATION NUMBER 11040011, LEGAL ADDRESS: 80-83 LONG LANE, LONDON, UNITED KINGDOM, EC1A 9ET, WHO IS THE PROVIDER OF PAYMENT SERVICES UNDER THE BUSINESS NAME GEMBA („GEMBA“, „WE“, „US“ OR „OUR“). FOR THE PURPOSES OF THE GENERAL DATA PROTECTION RULES APPROVED BY THE EU PARLIAMENT ON 14 APRIL 2016 WITH ENFORCEMENT DATE AS 25 MAY 2018 (THE "ACT"), THE DATA CONTROLLER IS GEMBA.

## 1. WHAT INFORMATION WE COLLECT

WE MAY RECEIVE PERSONAL INFORMATION AND CONTACT DETAILS FROM YOU, SUCH AS NAME, DATE OF BIRTH, PLACE OF BIRTH, ADDRESS, TELEPHONE NUMBER, EMAIL ADDRESS, INFORMATION REGARDING YOUR EMPLOYMENT, FINANCIAL STATUS, BANK ACCOUNT DETAILS AND SOME OTHER INFORMATION WHEN YOU:

1. OPEN AN ACCOUNT WITH US;
2. USE THE SERVICES MADE AVAILABLE ON OUR SITE;
3. COMPLETE ANY SURVEYS WE ASK YOU TO COMPLETE FOR RESEARCH PURPOSES (ALTHOUGH YOU WILL NEVER BE OBLIGED TO RESPOND TO THEM);

4. ENTER ANY COMPETITIONS OR PARTICIPATE IN ANY PROMOTIONS SPONSORED BY US;
  5. RESPOND TO OUR DIRECT MARKETING ACTIVITIES;
  6. CORRESPOND WITH US BY POST, EMAIL OR VIA THE "SEND MESSAGE" AND "SEND FEEDBACK" FORMS ON OUR SITE; OR
  7. REPORT A PROBLEM WITH OUR SITE.
2. IF YOU ARE A CORPORATE ENTITY, WE MAY ALSO COLLECT YOUR REGISTERED NAME, REGISTERED OFFICE ADDRESS, MEMORANDUM OF ASSOCIATION, ARTICLES OF ASSOCIATION, LIST OF CURRENT SHAREHOLDERS, LIST OF CURRENT DIRECTORS, ANNUAL RETURN, IDENTIFICATION AND PROOF OF ADDRESS OF BENEFICIAL OWNERS, DIRECTORS AND ANY POWER OF ATTORNEY.
  3. WE MAY COLLECT INFORMATION ABOUT YOU CONTAINED IN ANY DOCUMENTS YOU PROVIDE TO US FOR THE PURPOSES OF VERIFYING AND PROCESSING YOUR APPLICATION FOR AN ACCOUNT WITH US.
  4. WE MAY COLLECT INFORMATION ABOUT YOUR TRANSACTIONS AND YOUR ACTIVITIES WHEN YOU APPLY FOR AN ACCOUNT WITH US AND CARRY OUT A TRANSACTION USING OUR SERVICES. SUCH INFORMATION MAY INCLUDE WITHOUT LIMITATION THE IDENTITY OF THE OTHER PARTY TO THE TRANSACTION, THEIR LOCATION AND THE CURRENCY AND AMOUNT OF THE PAYMENT.
  5. WE MAY RECEIVE INFORMATION ABOUT YOU FROM THIRD PARTIES, INCLUDING BUT NOT LIMITED TO CREDIT REFERENCE AGENCIES AND OTHER PROVIDERS OF PUBLIC INFORMATION.
  6. WHEN YOU VISIT OUR SITE, WE COLLECT INFORMATION ABOUT YOUR COMPUTER AND BROWSING ACTIONS BY THE USE OF COOKIES.
  7. IF YOU CONTACT US BY TELEPHONE OR IN WRITING, WE MAY KEEP A RECORD OF THE CONTENT OF THAT CORRESPONDENCE OR PHONE CALL.
  8. WE MAY MONITOR OR RECORD COMMUNICATIONS WITH US IN WHICH YOU TAKE PART:
    1. TO ASSIST US WITH THE DEVELOPMENT OF OUR SERVICES;
    2. TO TRAIN OUR STAFF;
    3. IF SO REQUESTED BY ORDER OF THE COURT, REGULATORY

## BODY OR LAW ENFORCEMENT ORGANIZATION.

9. WITH REGARD TO EACH OF YOUR VISITS TO OUR SITE, WE MAY AUTOMATICALLY COLLECT THE FOLLOWING:
  1. 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;
  2. INFORMATION ABOUT YOUR VISIT, INCLUDING THE FULL UNIFORM RESOURCE LOCATORS (URL) CLICKSTREAM TO, THROUGH AND FROM OUR SITE (INCLUDING DATE AND TIME);
  3. PRODUCTS YOU VIEWED OR SEARCHED FOR;
  4. 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.

OUR SERVICES ARE NOT INTENDED FOR USE BY THOSE UNDER THE AGE OF 18 AND WE DO NOT KNOWINGLY COLLECT PERSONAL INFORMATION FROM THOSE WHO ARE UNDER THE AGE OF 18. IF YOU ARE UNDER THE AGE OF 18, PLEASE DO NOT APPLY FOR AN ACCOUNT WITH US, PROVIDE ANY PERSONAL INFORMATION TO OUR SITE OR USE OUR SITE IN ANY OTHER WAY.

## 2. WHAT WE DO WITH YOUR INFORMATION

1. WE USE INFORMATION HELD ABOUT YOU TO:
  2. ADMINISTER AND PROCESS YOUR APPLICATION FOR THE SERVICES WITH US;
  3. ADMINISTER AND MAINTAIN OUR CUSTOMER ACCOUNTS AND RECORDS;
  4. PROVIDE OUR SERVICES TO YOU AND ENSURE SECURE TRANSACTION PROCESSING;

5. IMPROVE OUR SITE TO ENSURE THAT OUR SERVICE CONTINUES TO BE THE MOST APPROPRIATE SERVICE FOR YOUR NEEDS AND THAT CONTENT FROM OUR SITE IS PRESENTED IN THE MOST EFFECTIVE MANNER FOR YOU AND YOUR COMPUTER;
  1. HELP US IN OUR EFFORTS TO KEEP OUR SITE SAFE AND SECURE;
  2. VERIFY YOUR IDENTITY AND TO RESPOND TO ANY QUERY THAT YOU MAY RAISE WITH US;
  3. FULFILL ANY CONTRACTUAL OBLIGATIONS WE HAVE WITH YOU;
5. SEND REGISTERED USERS OF OUR SITE EMAIL COMMUNICATIONS FROM TIME TO TIME REGARDING UPDATES AND CHANGES TO OUR SERVICES AND ANY TECHNICAL, OPERATIONAL, ADMINISTRATIVE AND LEGAL NOTICES IMPORTANT TO OUR SITE WHICH WE CONSIDER ESSENTIAL.
6. WE DO NOT DISCLOSE YOUR PERSONAL INFORMATION TO ANY THIRD PARTIES FOR DIRECT MARKETING PURPOSES. HOWEVER, WE MAY SHARE PERSONAL DATA WITH THIRD PARTY COMPANIES AND ORGANIZATIONS CONTRACTED TO US TO HELP SUPPLY, MAINTAIN OR FACILITATE OUR SITE OR OUR SERVICES. THESE THIRD PARTIES MAY INCLUDE (WITHOUT LIMITATION) IT SUPPORT TEAMS, BANKS, EXCHANGE FACILITIES HAVING CONTROL OR JURISDICTION OVER US AND ELECTRONIC SEARCH PROVIDERS CARRYING OUT ANTI-MONEY LAUNDERING AND SANCTION CHECKS FOR US.
7. WE ARE OBLIGATED ON SELECTED MEASURES AGAINST LEGITIMIZATION OF PROCEEDS OF CRIME AND FINANCING OF TERRORISM TO KEEP RECORDS ABOUT YOU AND YOUR TRANSACTIONS FOR A PERIOD OF TEN YEARS.
8. WE MAY USE YOUR DATA TO CONTACT YOU FOR MARKET RESEARCH PURPOSES AND TO PROVIDE YOU WITH INFORMATION ABOUT OUR SERVICES, OFFERS AND PROMOTIONS WHICH MAY BE OF INTEREST TO YOU. IF WE DO SO, WE WILL CONTACT YOU BY EMAIL. IF YOU DO NOT WANT US TO USE YOUR DATA IN THIS WAY, PLEASE CONTACT US USING THE CONTACT DETAILS BELOW.
9. YOUR INFORMATION MAY BE USED BY US FOR THE PURPOSE OF RESEARCH AND STATISTICAL ANALYSIS AND INTERNAL CUSTOMER SERVICE MONITORING.
10. WE MAY DISCLOSE INFORMATION ABOUT YOU TO ANY OF OUR EMPLOYEES, OFFICERS, AGENTS, SUPPLIERS OR SUBCONTRACTORS INsofar AS REASONABLY NECESSARY FOR THE PURPOSES AS SET OUT IN THIS PRIVACY POLICY.

11. WE MAY DISCLOSE YOUR PERSONAL DATA TO ANY MEMBER OF OUR GROUP, WHICH MEANS OUR BRANCHES AND SUBSIDIARIES PROVIDED THE MENTIONED ENTITIES ARE AWARE OF AND HAVE UNDERTAKEN TO FOLLOW OUR PRIVACY POLICY.
12. WE MAY DISCLOSE YOUR PERSONAL DATA TO THIRD PARTIES IF WE ARE UNDER A DUTY TO DISCLOSE OR SHARE YOUR PERSONAL DATA IN ORDER TO COMPLY WITH ANY LEGAL OBLIGATION, OR IF WE REASONABLY BELIEVE THAT DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES IS NECESSARY IN ORDER TO ENFORCE AN AGREEMENTS; OR TO PROTECT OUR RIGHTS, PROPERTY, OR SAFETY OR THAT OF OUR USERS, OR OTHERS. THIS INCLUDES EXCHANGING INFORMATION WITH OTHER COMPANIES AND ORGANIZATIONS FOR THE PURPOSES OF FRAUD PROTECTION.
13. WE ARE REQUIRED BY STATUTE TO MAKE A DISCLOSURE TO THE NATIONAL FINANCIAL INTELLIGENCE UNIT WHERE WE KNOW OR SUSPECT THAT A TRANSACTION INVOLVES MONEY LAUNDERING OR TERRORIST FINANCING. WHERE WE ARE REQUIRED TO MAKE A DISCLOSURE IN RELATION TO ONE OF YOUR TRANSACTIONS, WE WILL NOT BE ABLE TO INFORM YOU ABOUT THE DISCLOSURE OR OUR REASONS FOR MAKING IT.
14. WE MAY DISCLOSE YOUR PERSONAL DATA 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 AND THEIR ADVISERS. IF OUR BUSINESS IS SOLD YOUR DETAILS WILL BE PASSED ONTO THE NEW OWNERS OF THE BUSINESS.
15. WE MAY EMPLOY THE SERVICES OF OTHER PARTIES FOR DEALING WITH VARIOUS MATTERS IN CONNECTION WITH OUR SITE AND THE SERVICES PROVIDED ON OUR SITE. THE PROVIDERS OF SUCH SERVICES MAY HAVE ACCESS TO YOUR PERSONAL DATA.
16. THE PERIOD OF USE OF THE PERSONAL DATA SUPPLIED BY YOU WILL NOT BE LONGER THAN WE DEEM NECESSARY BUT MAY BE UNLIMITED.
17. THE DATA PROTECTION LEGISLATION GIVES THE CUSTOMERS THE RIGHT TO ACCESS THE PERSONAL DATA THAT WE HAVE ABOUT THEM.
18. UNLESS THERE IS A PARTICULAR REASON, WE APPROVE CUSTOMER REQUESTS REGARDING DISCLOSURE OF THEIR INFORMATION TO THIRD PARTIES AFTER CHECKING THAT THE APPLICANT IS THE PERSON CONCERNED. ADDITIONALLY, IN CASE OF INACCURATE INFORMATION THAT WE KNOW ABOUT, WE WILL APPLY THE NECESSARY CHANGES TO IT.

19. IF YOU AS A CUSTOMER REQUIRES INFORMATION OR REQUIRE INFORMATION TO BE DISCLOSED TO A THIRD PARTY, WE ARE ENTITLED TO CHARGE YOU A MINOR FEE FOR ANY ADMINISTRATIVE WORK AND COSTS INVOLVED IN PRODUCING THIS INFORMATION.

### 3. KEEPING INFORMATION UP TO DATE AND SECURE

1. IF ANY OF THE INFORMATION THAT YOU HAVE PROVIDED TO US CHANGES, FOR EXAMPLE, IF YOU CHANGE YOUR EMAIL ADDRESS OR OTHER CONTACT DETAILS, OR IF YOU WISH TO CLOSE YOUR ACCOUNT WITH US, PLEASE UPDATE YOUR ACCOUNT DETAILS ON OUR SITE OR, ALTERNATIVELY, CONTACT US USING THE CONTACT DETAILS BELOW.
2. WHERE WE HAVE GIVEN YOU (OR WHERE YOU HAVE CHOSEN) A USERNAME AND PASSWORD WHICH ENABLE YOU TO ACCESS CERTAIN PARTS OF OUR SITE, YOU ARE RESPONSIBLE FOR KEEPING YOUR USERNAME AND PASSWORD CONFIDENTIAL. WE ASK YOU NOT TO SHARE THIS INFORMATION WITH ANYONE.

### 4. WHERE WE STORE YOUR DATA

1. ALL INFORMATION YOU PROVIDE TO US IS STORED ON OUR SECURE SERVERS INSIDE THE EUROPEAN UNION WE HAVE IN PLACE A LEVEL OF SECURITY APPROPRIATE TO THE NATURE OF THE DATA AND THE HARM THAT MIGHT RESULT FROM A BREACH OF SECURITY. 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 UNAUTHORIZED ACCESS.
2. THE DATA THAT WE COLLECT FROM YOU MAY BE TRANSFERRED TO A DESTINATION OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA"). IT MAY ALSO BE PROCESSED BY STAFF OPERATING OUTSIDE THE EEA WHO WORK FOR US OR FOR ONE OF OUR SUPPLIERS. SUCH STAFF MAYBE ENGAGED IN, AMONG OTHER THINGS, THE PROVISION OF SUPPORT SERVICES. BY SUBMITTING YOUR PERSONAL DATA, YOU AGREE TO THIS TRANSFER OR PROCESSING OUTSIDE THE EEA. WE WILL TAKE ALL STEPS REASONABLY NECESSARY TO ENSURE ADEQUATE SECURITY FOR YOUR PERSONAL DATA.

## 5. COOKIES

OUR WEBSITE USES COOKIES TO DISTINGUISH YOU FROM OTHER USERS OF OUR SITE. THIS HELPS US TO PROVIDE YOU WITH A MORE PERSONALIZED EXPERIENCE WHEN YOU BROWSE OUR WEBSITE AND ALSO ALLOWS US TO IMPROVE OUR SITE. BY CONTINUING TO BROWSE THE SITE, YOU ARE AGREEING TO OUR USE OF COOKIES.

## 6. YOUR RIGHTS

YOU HAVE CERTAIN RIGHTS UNDER THE DATA PROTECTION REGULATION IN RELATION TO THE INFORMATION THAT WE HOLD ABOUT YOU. THESE RIGHTS INCLUDE THE RIGHTS SET OUT BELOW:

1. YOU ARE ENTITLED TO HAVE ACCESS TO YOUR PERSONAL DATA. YOU MAY REQUEST BY WRITING TO US (AT THE ADDRESS GIVEN BELOW), DETAILS OF YOUR INFORMATION WHICH WE HOLD AND THE PURPOSES FOR WHICH IT IS HELD. WE WILL PROVIDE THIS INFORMATION WITHIN 40 DAYS OF YOUR REQUEST, SUBJECT TO ANY ROUTINE PROCESSING CONTINUING BETWEEN THAT TIME AND THE TIME OF RESPONSE. YOU MAY BE CHARGED A REASONABLE FEE FOR THIS INFORMATION.
2. YOU ARE ENTITLED TO REQUEST THAT WE STOP USING INFORMATION ABOUT YOU FOR THE PURPOSE OF DIRECT MARKETING (I.E. THE COMMUNICATION TO YOU (BY WHATEVER MEANS) OF ANY ADVERTISING OR MARKETING MATERIAL);
3. YOU ARE ENTITLED TO REQUIRE US TO ENSURE THAT NO DECISION TAKEN BY OR ON BEHALF OF US AND WHICH SIGNIFICANTLY AFFECTS YOU IS BASED SOLELY ON THE AUTOMATED PROCESSING OF YOUR INFORMATION, FOR THE PURPOSE OF EVALUATING SUCH MATTERS AS, FOR EXAMPLE, YOUR CREDITWORTHINESS, RELIABILITY OR CONDUCT; AND
4. YOU ARE ENTITLED TO REQUIRE A CORRECTION OF ERRORS IN THE PERSONAL INFORMATION HELD ABOUT YOU. IF WE DISAGREE THAT INFORMATION IS INACCURATE YOU ARE ENTITLED TO APPLY TO ASK THE COURT FOR AN ORDER THAT SUCH ERRONEOUS INFORMATION IS RECTIFIED, BLOCKED, DESTROYED, OR ERASED.



## 7. THIRD-PARTY WEBSITES

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.

## 8. YOUR CONSENT AND CHANGES TO THIS PRIVACY POLICY

BY SUBMITTING YOUR INFORMATION, YOU CONSENT TO THE USE OF THAT INFORMATION AS SET OUT IN THIS POLICY. IF WE CHANGE OUR PRIVACY POLICY, WE WILL POST THE CHANGES ON THIS PAGE AND MAY PLACE NOTICES ON OTHER PAGES OF THE WEBSITE (SUCH AS THE HOME PAGE) FOR A REASONABLE PERIOD OF TIME, SO THAT YOU MAY BE AWARE OF THE CHANGES. WE WILL ALSO UPDATE THE "LAST MODIFIED" DATE AT THE TOP OF THIS PRIVACY POLICY. YOU SHOULD CHECK THIS PAGE OCCASIONALLY TO ENSURE YOU ARE HAPPY WITH ANY CHANGES WE MAKE. YOUR CONTINUED USE OF THIS SITE FOLLOWING ANY CHANGES TO THIS PRIVACY POLICY WILL MEAN YOU ACCEPT THOSE CHANGES.

## 9. CONTACT DETAILS

IF YOU WOULD LIKE TO CONTACT US WITH ANY QUERIES OR COMMENTS REGARDING OUR PRIVACY POLICY, PLEASE CONTACT US USING THE CONTACT DETAILS BELOW:

GEMBA FINANCE LTD

ADDRESS: 80-83 LONG LANE,  
LONDON, UNITED KINGDOM, EC1A 9ET

EMAIL: [DATAPROTECTION@GE.MBA](mailto:DATAPROTECTION@GE.MBA)

## 10. VALIDITY AND EFFECTIVENESS

THIS PRIVACY POLICY IS VALID AND EFFECTIVE FROM JANUARY 03, 2020.