

Information we collect

We collect and process personal information in three ways:

1) Information you give us

• **Personal Information**. When you use the Xinfu Services, we may ask for information about you. This may include your name, date of birth, home address, billing address, office address, e-mail address, the form(s) of identification you provide (e.g. passport or driving licence) and the personal information contained within those forms of identification, mobile telephone number, landline telephone number, credit or debit card information, other payment details, such as your bank account information, as required by us in order to complete your transaction and provide your payment choices and travel details (including future travel dates and destinations). Failure to provide the information we required may result in us not being able to process the transaction and proceed the order.

2) Information we collect from your use of our services

We may collect information about you, the Xinfu Services and how you use them. This could include:

- Transactional information about our Services and how you use them.
- Information you share with us when you contact us for any reason either in writing, by phone or by any other means. This may for example be in-store at one of our branches, through our contact centres, online services or through social media.
- Content you post on our websites, including personal descriptions, photographs and videos
- Information when you take part in promotions, or competitions or surveys.
- Details of your visits to the Online Services. This includes page interaction and Online Services site activity, including which website you came from, pages you viewed during your visit, and the page you viewed immediately after you left.
- Data collected by cookies and corresponding technologies, together with the personal information we have collected.
- Location information, for example your IP address, registered beacons or GPS (geo-location) signals. We may use your exact geo-location when you have consented to it.
- Your marketing preferences.
- CCTV images from equipment in place at our stores and ATMs for the purposes of prevention and detection of crime and public safety.

3) Information we receive from third parties

We may also receive information from third parties. This may include:

- Non-personal information used to supplement existing information, such as demographics and affluence metrics (e.g. social-demographic groupings through matching postcode information).
- Information about you from other sources with whom we work closely to provide our Service to you, including third party payment and delivery service providers, identify verification and fraud prevention services.

How we use the information we collect

We may use your information for the following purposes:

- Collecting payment, processing and fulfilling your order, providing order tracking facilities, or otherwise providing you with the information, products and services you may request from us.
- Complying with our legal and regulatory obligations (including fraud prevention, anti-money laundering and sanction screening). This may include checking the information you provide to us against information from other sources.
- Enforcing any contract entered into between you and us for our Services
- Contacting you (including by email or SMS) with marketing messages according to your preferences.
- Providing you with any alerts, in App messages or other messages you have registered to receive.
- Providing you with service messages, notifying you about changes to our Services or changes to our terms, conditions and policies.
- Improving customer experience and our quality of service.
- Data analysis to allow us to derive insight and to help make our Services personalised and relevant, as well as to develop our business processes, products and services.
- Enabling us and third party websites to display relevant and targeted advertisements, based on previous behaviour, purchases, or any other relevant information.

Information we share

We may disclose your personal information to any member within our own group. We do not share personal information with companies, organisations or individuals outside of Xinfu for marketing purposes or otherwise, nor do we sell your personal information. The only time your personal information may be shared with a third party is if:

- We have your prior consent to do so. For example, when you consent to receiving direct marketing or where the information is sensitive in nature.
- We are processing information externally, through a trusted business partner, based on Xinfu's explicit instruction and in compliance with our Privacy Policy, confidentiality and levels of security.

- We are using a third party to send targeted advertisements, using an identifier such as an email address or site cookies.
- We have aggregated, non-personally identifiable information, which is to be used for segmentation, statistical modelling, general research or trend analysis.
- We sell or buy any new business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business assets.
- We are purchased by a third party, in which case personal information held by us including you as our customer will be transferred. We will notify you of this through the most appropriate means.
- We need to comply with the obligations we have to our third party product issuers or third parties providing products or services on our behalf, so that they may process your order or otherwise provide the information, products or services you have requested (please note that these third party product issuers have their own privacy policies and accordingly we cannot accept any responsibility or liability for the handling of personal information by such third parties in accordance with such policies).
- We are under a duty to disclose or share your personal information in order to comply with our legal obligations or in order to enforce our conditions of sale (including the Online Terms and Conditions) and other agreements; or to protect the rights, property, or safety of Xinfu, our customers, or others. This includes exchanging information with other organisations and law enforcement agencies for the purposes of anti-money laundering obligations and sanction compliance, fraud protection and credit risk reduction.

Retention of Personal Information

We only retain your personal information for as long as is necessary for us to use your information as described above or to comply with our legal obligations.

Maintenance of Accurate Information

We strive to ensure that the information we maintain about our customers is accurate, current and complete. We respond to requests from customers to correct inaccurate information in a timely manner so please tell us if you think we hold incorrect information about you at the address below.

Security and Storage

We have a number of security measures in place to protect your personal information. However, when transmitting personal information over the internet, please bear in mind that no transmission over the internet can ever be guaranteed secure. Therefore, please note that we cannot guarantee the security of any personal information that you transfer over the internet to us.

We may store your information in printed or electronic format, in our business locations or in storage and data processing facilities that are owned and operated by our service providers.

Cookies

Cookies are small text files placed on your computer, phone or tablet by websites or sometimes by emails. Cookies provide us with useful information which we use to improve our Website and make it possible for Xinfu to identify some of your preferences. When you revisit our Website, Xinfu's computer server will recognise the cookie, giving us information about your previous visits which help us to analyse how our customers interact with our sites so we can make improvements. This is statistical data about our users' browsing actions and patterns, it does not identify you as an individual.

We use two types of cookies on our websites

- 1. Session cookies that are deleted after each visit.
- 2. Persistent cookies that remain in place across multiple visits to our sites until they either expire or you delete them.
- 3. Most browsers are originally configured to accept cookies automatically; however, you may also refuse to accept cookies by activating the setting on your browser. Please note that if your browser is not configured properly or if you alter your browser to disable the acceptance of cookies, you may not be able to use the Website.

Unless you have adjusted your browser settings so that it will refuse cookies, our system will automatically issue cookies when you access our Website.

Please note that our advertisers may also use cookies, over which we have no control. You should check the Privacy Policy of advertiser websites to find out how they manage cookies.

Links to Third Party

Our Website may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and accordingly we cannot accept any responsibility or liability for such policies. It is therefore advisable to check these policies before you submit any personal information to these websites.

Access to Information

If you require access to the information we hold about you, please send your request in writing to the address set out below. Any request may be subject to a prescribed fee, where we are legally permitted to charge in order to meet our costs in providing you with details of the information we hold about you. If you find that the information we hold about you is inaccurate or out-of-date then we will endeavour to correct it upon receiving your request in writing.

Providing personal information about other people

You can provide us with another person's personal information to enable us to contact them (for e.g. by recommending a friend to use Xinfu Services, or by entering them into a

competition). By providing the other person's information we rely on you for the accuracy of their information such as email address, mobile phone number or postal address. A message may be sent to the other person using the contact details provided by you and this message will make reference to your name and explain to the recipient that you were the source of his/her contact details.

Removal from Xinfu Email Marketing Communications

You may want to discontinue receiving information from us. While this may mean that you will not receive product or service information of interest to you, we respect anyone's wishes not to be informed directly of these promotions or product introductions.

You will be provided with an unsubscribe link in any email or SMS message we send you.

Changes to Our Privacy Policy

Any changes we make to our Privacy Policy in the future will be posted on our website. Please do check our Privacy Policy from time to time to take notice of any changes made. By providing us with your personal information, using the Online Services and/or any service or product offered via the Online Services, providing us with personal information in-store at one of stores or over the phone, or by placing orders after we have changed the terms of our Privacy Policy, you will be deemed to have accepted these changes. We will advise you of significant changes to this Privacy Policy where we have your contact details.

This policy was last updated on 17th July 2020