



PRIVACY POLICY

PROFESSIONAL CLIENTS AND ELIGIBLE COUNTERPARTIES



WESTFORT
BANK

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This is the Privacy Policy of WESTFORT Bank and of its affiliated companies ("WESTFORT. WESTFORT Bank respects your privacy and is committed to always protecting your personal data understanding the protection of personal data is a fundamental human right. WESTFORT Bank informs you about its Privacy Policy regarding the treatment and protection of personal data of users that may be collected by browsing through the website, in accordance with EU General Data Protection Regulation 679/2016 (GDPR), the Directive 2002/58/CE (E-Privacy) and their subsequent amendments and any further relevant regulation. In this sense, WESTFORT Bank guarantees compliance with current regulations on the protection of personal data, hereinafter with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 regarding the protection of natural persons (GDPR).

The WESTFORT Bank Privacy Policy mainly covers the following parts:

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WESTFORT BANK AS DATA CONTROLLER

Following you can find the contact details of WESTFORT Bank as a data controller for the processing of your personal data.

Identity: WESTFORT Bank
E-mail: support@westfortbank.com

PERSONAL DATA COLLECTION

The data collected from those who access the site will be processed at the WESTFORT Bank Labs, offices, in the manner set out by the GDPR provisions and all applicable laws.

The cases in which you do provide your personal data are the following:

- By contacting through the contact forms or sending an email.
- By downloading one of our resources (e-books & white papers, product Sheets) and agreeing to send news from WESTFORT Bank.
- By requiring a Demo of our product.
- By giving your consent to receive emails from WESTFORT Bank about their solutions, resources, and services.
- By subscribing to our newsletter.



What information we collect

We collect and store the personal data which has been provided by you ("user"). The personal information generally includes your name, last name, country, e-mail address, company name and Job Title.

Purposes of the processing of your personal data and the legal basis for the processing

Personal Data

Pursuant to the GDPR, personal data means any information relating to an identified or identifiable natural person («data subject»); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. When you connect to the website to send an email to WESTFORT Bank, subscribe to their newsletter or request a demo of products, you are providing personal information for which WESTFORT Bank is responsible. Your personal data will not be used in any manner that is incompatible with the purpose for which it was collected.

The personal data and the purpose of the processing by WESTFORT Bank are listed below:

Contact Forms

WESTFORT Bank requests personal data among which may be: Name and surname, e-mail address, telephone number, country, company name and job title, this in order to answer your questions.

For example, WESTFORT Bank uses this data to respond to your messages, doubts or concerns that you may have regarding the information included in the website, the services / products we offer, questions regarding the legal texts included in the website, as well another query that you may have that is not subject to the conditions of the website.

Basis for the processing: Consent for responding to your contact request.

Newsletter Subscription Form

WESTFORT Bank requests the following personal information: Name and surname, email address, telephone number and product interested to manage the subscription list, send newsletters and send emails about WESTFORT Bank solutions, resources, and services (Marketing purpose). Basis for the processing: consent to the processing.

The data you provide to WESTFORT Bank will be located on Hubspot's servers, with an address in Cambridge Massachusetts.

Request a Product Demo Form.

WESTFORT Bank requests the following personal information: Name and surname, email address, company name, country, phone number, job title and product interested to manage user request, send and explain the Demo to the user interested product, and also explaining all westfort bank product suite.

Basis for the processing: Consent for responding to your contact request.

Download Resources.

WESTFORT Bank requests the following personal information: Name and surname, email address, company name, country, phone number and job title to offer the user product sheets, e-books, and white papers that explain the fintech world and how WESTFORT Bank is helping the finance innovation.

Basis for the processing: Consent for responding to your contact request.



Collection of general and statistical data (to analyze navigation)

WESTFORT Bank collects other non-identifying data that are obtained through the use of cookies that are downloaded to your computer when you browse the website, the characteristics and purpose of which are detailed in the Cookies Policy. Basis for the processing: consent to the processing.

Recipients of your personal data

The recipient of your personal data is only WESTFORT Bank. In case your personal data is to be transferred, WESTFORT Bank will inform you in advance. Personal information will only be shared by WESTFORT Bank to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

Transfers of your personal data

The controller of your personal data is WESTFORT Bank.

WESTFORT Bank, as a global company, has a number of legal entities in different jurisdictions which are responsible for the personal information which they collect and which is processed by WESTFORT Bank. WESTFORT Bank usually do not transfer any personal data outside European Union.

If WESTFORT Bank does that, will use a specific privacy notice for the international transfer of personal information collected in the European Union.

Also WESTFORT Bank will provide a specific privacy notice with a detail of the Countries where the data are transferred. However, when personal data will be transferred outside the European Union, the transfer will be put in place in accordance with provisions of GDPR and all applicable laws (as specified in each privacy notice).

Protection of Personal Information

WESTFORT Bank takes the security of your personal information very seriously. When your personal data is stored by WESTFORT Bank, we use computer systems with limited access housed in facilities using physical security measures. When you use some WESTFORT Bank products, services, or applications or post on an WESTFORT Bank forum, chat room, or social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them.

You are responsible for the personal information you choose to share or submit in these instances.

Our Company wide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to WESTFORT Bank employees and strictly enforce privacy safeguards within the company.

WESTFORT Bank may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

Data Retention

WESTFORT Bank makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Retention period for each purpose:

Contact, Download Resources and Request a Product Demo Forms: WESTFORT Bank will retain the data for the period necessary to fulfill the user request.

Subscriptions (Newsletter): The personal data you provide to WESTFORT Bank will be kept until you request its deletion. This type of purpose is based on a user's consent, and therefore the user can withdraw his consent at any time and also object to the processing.



Cookies and Other Technologies

WESTFORT Bank' websites, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies. These technologies help WESTFORT Bank better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

WESTFORT Bank and our partners also use "cookies" and other technologies to remember personal information when you use our website, online services, and applications. WESTFORT Bank goal in these cases is to make your experience with WESTFORT Bank more convenient and personal.

Possible consequences of the providing your personal data and of failure to provide them to WESTFORT Bank

The providing your personal data to WESTFORT Bank will allow WESTFORT Bank to provide and improve WESTFORT Bank' products, services, content, and advertising, in benefit of the companies you are working to or you are collaborating with. You are not required to provide the personal information that we have requested. In case WESTFORT Bank cannot be provided with your personal data, it would be difficult for WESTFORT Bank to adequately provide and improve WESTFORT Bank' products, services, content, and advertising, in benefit of the companies you are working to or you are collaborating with.

Exercising of your rights

WESTFORT Bank informs you that under provisions of GDPR, regarding your personal data you have the right to:

- Request access to stored data.
- Request a rectification or cancellation.
- Request the limitation of your treatment.
- Object to the processing.
- Request the portability of your data.

Furthermore, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before this withdrawal.

Data Protection Officer

For any questions regarding the processing of your personal data, please contact our Data Protection Officer, using the following contact details:

e-mail: support@westfortbank.com

Privacy questions

If you have any questions or concerns about WESTFORT Bank' Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact WESTFORT Bank at support@westfortbank.com.

When a privacy question is received by WESTFORT Bank, WESTFORT Bank have a dedicated team which seeks to address the specific concern or query which you are seeking to raise. Where your issue may be more substantive in nature, more information may be sought from you. All such substantive contacts receive a response.

If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask WESTFORT Bank, WESTFORT Bank will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.