

**PUBLIC**  
**Ningi**  
**External Privacy Notice**



# Ningi

## External Privacy Notice

Last Updated: 05/01/24

### 1. Who we are and what we do

#### Who we are

Ningi ("Ningi", "us", "we", "our") is a limited company registered in England and Wales under registration number 1336367. Our registered office at The Avenue, Maskew Avenue, Peterborough, England, PE1 2AS. We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO") in relation to our processing of Personal Data under registration number ZB098889.

#### What we do

We provide a platform that offers an all-in-one financial management solution to help independent advisors provide their services. We are committed to protecting the privacy and security of the Personal Data we process about you.

### 2. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the '*How to contact us*' section.

Please note: this Privacy Notice is intended for individuals where we are the Data Controller of Personal data. This means that we decide what Personal Data to collect and how to process it. If you are part of an organisation that uses the Ningi platform, we are the Data Processor of your personal data. You should consult your organisation's Privacy Notice to understand how they use your personal data as the Data Controller.

### 3. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You purchase goods or services from us
3. You enquire about our products and/or services
4. You use our platform
5. You sign up to receive newsletters and/or other promotional communications from us

## **4. What Personal Data is**

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

## **5. Personal Data we collect**

The type of Personal Data we collect about you will depend on our relationship with you. Below is an example of the different categories of personal data we may collect and process about you.

- **Profile/Identity Data:** This is data relating to your first name, last name, gender, date of birth.
- **Contact Data:** This is data relating to your phone number, addresses, email addresses, phone numbers.
- **Marketing and Communications Data:** This is your preferences in receiving marketing information and other information from us.
- **Billing Data:** This is information relating to your debit and credit card information such as the name attached to your payment details and your billing address.
- **Financial Data:** These are your banking details e.g., your account number and sort code.
- **Transactional Data:** This is information of details and records of all payments you have made for our services or products.
- **Usage Data:** This refers to information related to how you interact with our services, such as your browsing activities, feature usage, and preferences while using our website or application.
- **Technical Data:** This encompasses details about the devices you use to access our services, including device type, operating system, browser type, IP addresses, cookies, and other technical identifiers.

## **6. How we collect your Personal Data**

We collect most of the Personal Data directly from you via our website, email, phone or in person.

However, we may also collect your Personal Data from third parties such as:

- others to whom you have provided consent
- publicly available sources such as social media platforms

## 7. How we use your personal data & lawful basis

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the circumstances detailed below.

Applicable Data Protection legislation also requires us to identify appropriate lawful bases to process personal data. The lawful basis we rely on as a data controller are detailed below with brief examples for when they may apply:

Activities	Lawful Basis for processing
<ul style="list-style-type: none"><li>• Signing up to the platform and account creation</li><li>• Making a purchase on the website</li><li>• Requesting/attending live demo of our products/services</li><li>• Enquiring about our products/services</li></ul>	<b>Contract</b> – We require personal data from you to fulfil our contractual obligations and provide you with the requested service(s)
<ul style="list-style-type: none"><li>• Receiving marketing comms from us in relation to our products and services</li><li>• User support with specific products</li></ul>	<b>Consent</b> – you have given us your consent to process your personal data in this way/for these purposes.
<ul style="list-style-type: none"><li>• Sharing personal data with third parties for the purposes of preventing illegal activities</li><li>• Retention of personal data relating to financial transactions</li></ul>	<b>Legal Obligation</b> – we are required by law to process personal data in these situations.
<ul style="list-style-type: none"><li>• To troubleshoot our website, platform</li><li>• To maintain the system and ensure it is performing correctly</li><li>• Data analysis and reporting to improve the services/products</li><li>• Data analysis to understand our users</li></ul>	<b>Legitimate Interests</b> –processing your personal data enables us to meet our legitimate interests, for aspects reasonably expected by you, as part of providing our services. Where this lawful basis is used, we will always ensure the processing is proportionate and your rights as a data subject are not infringed.

## 8. Sharing your Personal Data

We may share non-Personal Data with third parties. We may share your Personal Data with subcontractors or affiliates (subject to confidentiality obligations to use it only for the purposes for which we disclose it to them and pursuant to our instructions).

We may also share Personal Data with interested parties, in the event that Ningi Limited anticipates a change in control, or the acquisition of all or part of our business, or assets or with interested parties in connection with the licensing of our technology.

Our site/platform may include links to third-party websites, plug-ins 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 Site, we encourage you to read the privacy policy of every website you visit.

## 9. International Transfers

Your Personal Data may be processed outside of the UK. This is because some of the organisations we use to provide our services to you, are based outside the UK.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or
- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf \(ico.org.uk\)](#)).

## 10. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**  
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)  
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**  
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)

You have the right to ask us to delete your Personal Data.

- **Right to object to processing**

You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.

- **Right to restrict processing**

You have the right to restrict our use of your Personal Data.

- **Right to portability**

You have the right to ask us to transfer your Personal Data to another party.

- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

- **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

- **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at:

[Contact us | ICO](#)

or by phone on 0303 123 1113

### **How to exercise your rights**

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

## **11. Children's Privacy**

We do not offer our products and services to children and we do not knowingly collect Personal Data of children without parental consent, unless permitted by law. If you learn that a child has provided us with their Personal Data without parental consent, you may contact us, as described below, and if appropriate, we will securely and permanently delete it, in accordance with applicable law.

## **12. Automated Decision-Making and Profiling**

Profiling is part of what we do, as it enables us to ensure you receive advice that is most suited to you as an individual. We don't use automated decision-making and profiling in a way that produces legal effects, or significantly affects you. If you have any questions about this, you can contact us using the details in the 'Contact Us' section.

## **13. Use of Cookies and Similar Technologies**

Our website and platform utilises cookies and similar technologies. You can find out more by viewing our cookie notice available [\[here\]](#).

## **14. Security and storage of information**

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.

If we become aware of any loss, misuse, alteration of personal data we will work closely with our IT team, DPO and other parties as necessary to investigate the incident at hand. We have put into place the relevant procedure and policies in place to investigate, mitigate and report (when needed to relevant parties) such instances.

## **15. Data Retention**

We will not keep Personal Data longer than is necessary, for the purpose or purposes for which they were collected. Ningi will take all reasonable steps to destroy, or erase from its systems, all Personal Data which is no longer required. This does not apply to anonymised data.

## **16. How to contact us and our Data Protection Officer**

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

The Avenue, Maskew Avenue, Peterborough, England, PE1 2AS

Email: [dataprotection@ningi.co.uk](mailto:dataprotection@ningi.co.uk)

We have also appointed a Data protection Officer ("DPO"). Our DPO is Evalian Ltd can be contacted as follows:

Evalian Limited  
West Lodge  
Leylands Business Park  
Colden Common  
Hampshire  
SO21 1TH  
United Kingdom

Phone: +44 (0)333 050 0111

Website: [www.evalian.co.uk](http://www.evalian.co.uk)

## **17. Changes to this privacy notice**

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so. If you wish to request a past version of this Privacy Notice, please use our contact details above.

Last modified 06/12/23