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1. Information on Processing of Personal Data

This Privacy Policy describes how ICM House Kommanditbolag (“ICM House”, “ICM House”, “ICM”, “us”, “we”) processes your personal data in accordance with the EU general data protection regulation “GDPR”. The GDPR is applicable from 25 May 2018 and replaces the Swedish Personal Data Act (*Datalagen*). “Personal Data” means any information related to an identified or identifiable natural person, such as name, contact details, personal identification number, account number and other information that directly or indirectly can be attributed to an individual person. If you have further questions you can contact our Customer Support Team at support@icmhouse.com or +44 207 634 9779.

2. Data Controller

For your personal data being processed, for instance to provide the services you have requested, to contact you as a customer, and to otherwise fulfil our duties and obligations, the data controller is ICM House KB (registration number: 969792-7961 registered address: P.O. Box 313, 116 74 Stockholm, Sweden; Telephone number: +44 207 634 9779; Email: support@icmhouse.com; Website: www.icmhouse.com).

3. Data Protection Officer

If you are unable to find the information you are looking for in this Privacy Policy, or if you otherwise have questions on how ICM House processes your personal data, you can contact our data protection officer at email dataprotection@icmhouse.com or by phone at +44 207 634 9779.

4. Purpose of Personal Data Processing

ICM House processes Personal Data to provide the services you have requested. The “Agreement” between you as the customer and ICM House consists of you using one of our provided services. ICM House has a lawful basis for processing your Personal Data in order to provide to you the services contracted pursuant to our Agreement.

Personal Data provided in relation to your Agreement with us (by email, phone or otherwise), together with your application or your expression of interest, when entering into an Agreement or

in preparations thereto, or otherwise recorded when administering the contractual relationship with you, and for other measures, which have been taken before or after the conclusion of the Agreement, is processed by ICM House in the purpose of administration and documentation of our customer relationship with you.

We also process Personal Data when you contact us as a customer, potential new or past customer relationship, including information on your representatives (including, but not limited to financiers, guarantors, guarantee/warranty holders, fiduciaries, etc.) and to handle complaints. If you call ICM House, we may record your phone call and, in such case, you will be informed about this prior to recording.

In order to maintain correct and updated information, ICM House may supplement personal data by retrieving information from private and public registries, for instance by updating your address information using the state-run personal address registry "SPAR".

In addition, ICM House processes Personal Data in order to gather and verify Personal Data before making decisions regarding whether to accept you as a new customer and whether to provide services to you, and to manage concluded agreements and to fulfil ICM House's legal and contractual obligations. Also, Personal Data is processed for market and customer analyses, used for marketing purposes, model and business development, statistics and risk management purposes. Risk management also include processing information about customers in order to determine credit quality for solvency requirement purposes.

If you did not object to direct marketing messages, Personal Data can also be used for direct marketing purposes and for sending various offers.

Furthermore, ICM House is in some circumstances obliged by law to disclose and otherwise process Personal Data in order to fulfil its obligations towards the Financial Supervisory Authority, Swedish Tax Agency, social security authority, police, and the enforcement authorities (both Swedish and foreign authorities). In addition, ICM House is under certain circumstances obliged to disclose and process Personal Data to comply with laws and regulations relating to accounting, anti-money laundering, solvency requirements (risk management), payment services legislation, transaction monitoring and fraud. In such cases, Personal Data is processed for these specified purposes.

ICM House is obliged (or has the right) to control its customer information against sanctions lists to ensure that we are entitled to provide certain services, by law or authority decision. Within the limits of applicable legislation, Personal Data may also be processed by companies belonging to the ICM House group within or without the EU/EEA (European Economic Area), and by companies with which

ICM House group cooperates in the provision of services. In such cases, personal data are processed for the above specified purposes.

5. Legal Basis for Processing of Personal Data

ICM House processes your Personal Data to the extent this is necessary for the performance of an Agreement to which you are a party, or in order to take steps prior to entering into an Agreement at your request. In addition, Personal Data is processed when it is necessary for compliance with ICM House's legal obligations (including but not limited to fulfilling obligations towards the Financial Supervisory Authority, Swedish Tax Agency, social security authority, police, or enforcement authorities in Sweden and outside). Such instances may relate to our legal obligations relating to accounting, anti-money laundering, combating the financing of terrorism, solvency requirements applicable payment services regulation, monitoring of transactions and fraud control.

In case you have explicitly given your consent to ICM House to process your Personal Data for one or several specific purposes, such consent will form the legal basis for processing of your Personal Data.

If we ask for your consent, you will receive specified information the processing subject to your consent and on what your consent entails.

To the extent ICM House processes Personal Data more extensively than necessary for the purposes of performance of an Agreement, or to comply with legal obligations, and the processing is not based on express consent, the legal basis for such processing is ICM House's legitimate interests. ICM House has identified a legitimate interest for which the processing of personal data is necessary, and after careful assessment considered that your interests and fundamental rights do not override ICM House's legitimate interests in such cases and do not require protection of Personal Data. ICM House has a legitimate interest to conduct market and customer analyses, prepare marketing activities, model and business development, statistics and to conduct direct marketing. In cases where Personal Data is processed in the context of such activities, ICM House's legitimate interests forms the legal basis for such processing necessary for purposes of ICM House's legitimate interests as above.

6. Recipients of Personal Data

For the Personal Data disclosed by you and gathered from public registries to supplement data, ICM House is the main party receiving and processing Personal Data. In addition, the following categories of recipients may also receive Personal Data in some cases: a) authorities in Sweden and abroad to whom ICM House is legally obligated to disclose information as described above, b) ICM House's group companies within or without the EU/European Economic Area, and companies with which the ICM House group cooperates to provide its services, such as credit information companies.

Under EU Payment Services Directive (PSDII), ICM House is in some cases obliged to provide external payment service providers access to customer account information, provided customer has provided clear consent. In such case, Personal Data may be processed by an external payment service provider acting as personal data controller.

7. Transfer of Personal Data outside EU/European Economic Area

Under certain circumstances, ICM House is obliged to transfer Personal Data abroad and outside the EU/European Economic Area, in cooperation with government authority. In addition, such Personal Data may be transferred to an ICM House group company outside the EU/EEA area, and to a company with which ICM House cooperates to provide its services.

In cases where ICM House is controller of data to be transferred outside the EU/EEA, such transfers are made in compliance with the GDPR to ensure equivalent protection of personal data. This means that either, there exists a decision by the EU Commission on the third country in question and its ensuring of adequate level of data protection, or that other appropriate safeguards are in place in that the recipient of personal data in a third country is subject to standard data protection clauses or binding corporate rules. In the absence of above-mentioned grounds for transfer, ICM House will obtain a specific authorization from the competent supervisory authority or, alternatively, your explicit consent to the transfer of Personal Data. If we ask for your consent for such transfer, you will be informed of any possible data protection risks of the transfer. If you wish to receive additional information on the safeguards applicable to the transfer of your personal data outside the EU/ EEA, please contact Customer Support on support@icmhouse.com.

8. For how long is my data stored?

ICM House will retain your Personal Data as long as you remain our customer, (i.e. as long as the agreement between you and ICM House remains valid). At the end of the customer relationship and upon Agreement termination, your data will be retained by ICM House in order to manage legal claims and to exercise our rights and fulfil our obligations in relation to potential claims and inquiries by former currency exchange and banking customers and in relation to authorities. ICM House is required to process some Personal Data to address obligations in relation to authorities such as the Financial Supervisory Authority, Tax Agency, social security authority, police, and enforcement authorities, and to ensure compliance with rules pertaining to accounting, anti-money laundering and combating the financing of terrorism, solvency requirements, and applicable payment services legislation, transaction monitoring, and fraud. Due to these regulatory requirements, we are obligated to retain Personal Data also when you are no longer our customer. For the above reasons, your data will be retained for a maximum period of ten (10) years after the Agreement has terminated and your customer relationship with ICM House has ceased.

If you contact ICM House but do not enter into an Agreement with us, your Personal Data will generally be retained for a maximum period of three (3) months, but may be stored further due to obligations under applicable anti-money laundering legislation.

If you do not enter into an Agreement with ICM House, the legal basis for the processing of your Personal Data is ICM House's legitimate interests to save your Personal Data to facilitate future communications, for instance if your account application has been rejected and you soon after wish to renew the application. Processing the Personal Data in this regard is necessary to facilitate this procedure and ICM House has after careful assessment considered that your interests and fundamental rights do not override ICM House's legitimate interests in this context and do not require protection of Personal Data.

When in contact with ICM House Customer Support, and if you have accepted that your phone call will be recorded, any such recording will be retained for a maximum period of three (3) months. The legal basis for the processing of this Personal Data is ICM House's legitimate interests, as ICM House has a legitimate interest to process the sound file for education purposes and to develop customer service. ICM House has, after careful assessment, considered that your interests and fundamental rights do not override ICM House's legitimate interests in this particular case and do not require protection of Personal Data.

9. Your Rights

You can contact us with questions about the processing of your personal data by email at support@icmhouse.com, or by calling +44 207 634 9779. You also have the right to request a register extract containing a summary of your Personal Data processed by ICM House along with information on how such data is processed. To verify your identity, a registry extract will be sent to you by registered mail.

In addition, you have the right to request rectification (request that we adjust inaccurate personal data), erasure (request that we erase personal data where the processing of such data is no longer necessary), restriction of processing (request that we restrict or limit the processing in some respects). Also, you may request data portability, meaning that you request that we provide

Personal Data provided by you to ICM House in a structured, commonly used and machine-readable format if you wish to transmit those data to another controller.

10. Direct Marketing

At all times and free of charge, you may object to the processing of your Personal Data for direct marketing purposes. You can do so by clicking the unsubscribe link in our emails or by submitting your request to support@icmhouse.com.

11. Withdrawing Consent

If ICM House processes your Personal Data based on your explicit consent, you have the right to withdraw such consent at any time. To do so, please inform us that you no longer accept the processing of your Personal Data based on your consent. However, such withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

12. Complaints

You have the right to lodge a complaint regarding ICM House's processing of Personal Data with the supervisory authority Datainspektionen, www.datainspektionen.se, telephone: 08-657 61 00.

13. Why does ICM House need your Personal Data?

If you have ordered, requested, or entered into an Agreement regarding one of ICM House's services, your provision of Personal Data is necessary to enter into such Agreement. If you are already an ICM House customer, additional Personal Data may be required in order to continue providing services and in order to govern the existing contractual relationship with you.

You are only obligated to provide Personal Data to fulfil the obligations arising out of your Agreement with ICM House. If you do not wish to disclose your Personal Data, it may mean that ICM House cannot offer services, support or information to you as a customer or otherwise in contact with ICM House.

14. Customer Profiling

Profiling (automated processing of personal data to evaluate personal aspects) may be conducted to form supporting data and statistical conclusions regarding customer analysis for marketing, method and business development. Personal Data processed is those submitted by yourself to ICM House and supplementary data from public registries such as the government personal address registry SPAR and other government agencies as well as creditors and financial institutes. As a result of profiling, you may receive tailored marketing communications.

At any time, you have the right to object to the continued profiling and processing of your personal data for direct marketing purposes.

15. From where have we received your Personal Data?

If ICM House processes Personal Data not provided by yourself, such data has been retrieved from the public state-run personal address registry SPAR and credit information companies. Personal Data retrieved from other sources relate to categories address information and credit eligibility information (creditworthiness).

16. Third Party Sites

Our website contains links to other websites. Please note that ICM House cannot be held

responsible for the privacy policies of other websites. We encourage all visitors to be aware and read the privacy statements of every website that collects personally identifiable information. ICM House can confirm that it has a strict policy of not sharing your Personal Identifiable Information with an unauthorized third party under any circumstances.

17. Privacy Statement Changes

ICM House may change this Privacy Policy at any time. If a change does occur, you will be notified accordingly, and where applicable, your consent would be required. You are advised to read the statements so that you are satisfied with the privacy conditions under which you provide ICM House with your personal information.