

Privacy Policy

[Last reviewed October 2022]

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use the service and tells you about your privacy rights and how the law protects you.

We use Your Personal data to provide and improve the Service. We commit to always keeping your personal data safe and private. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in the singular or in the plural.

Definitions

"You" means the individual accessing or using the service, or the company, or other legal entity on behalf of which such individual is accessing or using the service, as applicable. Under GDPR (General Data Protection Regulation), "you" can be referred to as the data subject or as the user as you are the individual using the service.

"Company" (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Stanhope Financial, The Exchange George's Dock, I.F.S.C, DUBLIN, Ireland D01 P2V6. For the purpose of the GDPR, the company is the Data Controller.

"Affiliate" means an entity that controls, is controlled by or is under common control with a party, whereas "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for the election of directors or other managing authority.

"Account" means a unique account created for You to access our Service or parts of our Service.

"Website" refers to SH Financial's website, accessible from <https://sh.financial/>

"Service" refers to the Website. Country refers to the United Kingdom & Lithuania.

"Service Provider" means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the GDPR, Service Providers are considered Data Processors.

“Third-party Social Media Service” refers to any website or any social network website through which a User can log in or create an account to use the Service.

“Personal Data” is any information that relates to an identified or identifiable individual. For the purposes of GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

“Cookies” are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

“Usage Data” refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

“Data Controller”; for the purposes of the GDPR (General Data Protection Regulation), refers to the Company as the legal person who alone or jointly with others determines the purposes and means of the processing of Personal Data.

Collecting and Using Your Personal Data

Usage Data

Usage Data is collected automatically when using the Service. Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data. We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Tracking technology and cookies

We may use cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

You can instruct Your browser to refuse all Cookies or to indicate when a cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our

Service. Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser.

We use both session and persistent Cookies for the purposes set out below:

Necessary/Essential Cookies

Type: Session Cookies, Administered by: Us, Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features.

Your Rights

If you ask, we will provide a copy of the personal data we hold about you. We can't give you any personal data about other people, personal data which is linked to an ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we've had with our legal advisers.

You have the right to ask us to delete your personal data. However, we may not be able to fulfil your request. As a regulated financial services provider, we must keep certain customers' personal data as required by law and regulation.