Hug Academy Privacy Policy

Our contact details

Name: Privacy Officer

Address: Suite 2A Blackthorn House St. Pauls Square, Birmingham, B3 1RL, United Kingdom

E-mail: <u>hello@hug.academy</u>

Date: 1st February 2024

The type of personal information we collect

We currently collect and process the following information for registration purposes:

- Email Address
- Title
- Given Name
- Surname

Our payment processing partner "Stripe" requires the following information for AML/KYC purposes):

- Name
- Postcode
- Bank or Credit Card details

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- For the normal operation of a membership site
- For the legal operation of a subscription service

We use the information that you have given us in order to provide tuition which may include an example asset portfolio that may be gifted to you in the future, should you meet the requirements specified in the Hug Academy Terms and Conditions.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) We have a legal obligation.

In order to subscribe and operate our service we need to identify our users for Anti-Money Laundering (AML) and Know Your Customer (KYC) purposes.

How we store your personal information

Your information is securely stored.

We keep registration details for a period of 60 days after you close your account. We will then dispose your information by an automated house-keeping task which deletes registration data automatically.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please email us at hello@hug.academy or write to us at Suite 2A Blackthorn House St. Pauls Square, Birmingham, B3 1RL, United Kingdom if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at email us at hello@hug.academy or write to us at Suite 2A Blackthorn House St. Pauls Square, Birmingham, B3 1RL, United Kingdom.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

ICO website: <u>https://www.ico.org.uk</u>