



EFFORTLESSWEALTHGROUP LIMITED

# PRIVACY POLICY

LAST UPDATED: 04 APRIL 2025

ISSUING PARTY

EFFORTLESSWEALTHGROUP LIMITED

RECEIVING PARTY

EWG MEMBERS

This is a Privacy Policy, in accordance with the General Data Protection Regulation (GDPR), of the EWG Platform and Connected Services.

Thank you for visiting the EWG Platform: [www.effortlesswealthgroup.com](http://www.effortlesswealthgroup.com) (the “Platform”).

## 01. Introduction

- 1.1. Who Are We?
- 1.2. The Platform is owned and operated by **EFFORTLESSWEALTHGROUP LIMITED**, a **Private Investment Club**, incorporated in England and Wales with company number **16252357**, whose registered office is at **3rd Floor, 86-90 Paul Street, London, England, EC2A 4NE** (collectively, “EffortlessWealthGroup”, “EWG”, “we”, “us” or “our”), under the Standard Industrial Classification (SIC) code: **94990** - Activities of Other Membership Organizations.
- 1.3. EWG needs to gather and use certain information about individuals. In data protection terminology EWG is defined as the “Data Controller” in respect of the personal information you provide us with.
- 1.4. What Is This Policy For?
- 1.5. We value your privacy and want to be accountable to you, and transparent with you, in the way that we collect and use your personal information. We also want you to know your rights in relation to your personal information.
- 1.6. This Privacy Policy tells you what to expect when we collect and use your personal information. We have tried to make it simple and easy for you to read and find the information that is most relevant to you. It also describes how this personal data must be collected, handled and stored to meet our data protection standards and to comply with the law.
- 1.7. We are always looking to improve the information we provide to our Members. If you have any questions or feedback on this privacy policy, please let us know using our contact details.

1.8. 1.3 Who Does This Policy Apply To?

1.9. This Privacy Policy applies to the collection, storage and use of personal information about you.

1.10. “You” refers to both Existing and Prospective EWG Members as well as Partners or any other people that EWG has a relationship with or may need to contact. These parties may be defined as the “Data Subjects”.

1.11. Specifically, this Privacy Policy provides you with details about the personal information we collect and hold about you, how we use your personal information and your rights regarding your personal information. It does not cover any use of your personal information by other Members whether they have accessed your information via our Platform or otherwise. That use will be governed by each relevant entity’s own privacy policy.

## **02. What We Do: Operating Statement**

2.1. This statement of operation clarifies how we operate and what membership means.

2.2. EWG operates strictly as a Private Investment Club. EWG does not publicly market or promote any investment products.

2.3. No financial advice is provided by EWG. Members are responsible for making their own informed decisions regarding any opportunities discussed within the club. EWG does not manage or control Member funds. All capital allocations are voluntary and self-directed.

2.4. Access to opportunities, Asset Management Protocols (AMPs), or related services is made available exclusively within the closed membership network and may be subject to approval. EWG and its team operate solely as facilitators of private Member information and do not act in a regulated capacity.

2.5. Membership in EWG does not constitute investment advice, legal advice, or financial planning. By participating in the club, all members acknowledge that they are acting on their own behalf and

take full responsibility for their own decisions.

### **03. How We Collect Your Personal Information**

- 3.1. We will collect personal information as requested during your Member onboarding, as detailed in the EWG Know Your Client (KYC) Policy and as provided in your preferences once logged in.

### **04. How We Use Your Personal Information**

- 4.1. We collect, use, and store your personal information for the following purposes:
- 4.1.1. Onboarding and Account Management: To facilitate your onboarding process as an EWG Member, maintain your Member Profile, and manage your ongoing membership and participation in investment opportunities.
  - 4.1.2. Investment Opportunities: To enable you to explore and engage with investment opportunities offered through the EWG platform, including viewing details of potential investments and participating in voting on Asset Management Protocols (AMPs).
  - 4.1.3. Communication and Support: To facilitate communication between you and EWG for service support, including technical assistance and responding to inquiries or requests.
  - 4.1.4. Compliance and Legal Obligations: To comply with legal, regulatory, and compliance obligations, including but not limited to anti-money laundering (AML) and counter-terrorism financing (CTF) requirements.
  - 4.1.5. Statistical Analysis and Platform Improvement: To conduct data analysis that helps us improve the functionality and user experience of our platform. This involves aggregating information to ensure content is presented effectively for you and improving platform security.
  - 4.1.6. Customization and Preferences: To store information about your preferences, allowing us to customize our platform according to your individual interests and recognize you

when you return.

- 4.1.7. Market Research: To conduct market research and statistical analysis to better understand your needs and interests, enhancing our service offerings and platform.
- 4.1.8. Security Measures: To enhance the security of our platform, ensure the integrity of our operations, and protect against fraud, unauthorized transactions, claims, or other liabilities.
- 4.1.9. Promotional Communications: Depending on your preferences and applicable laws, to send you promotional communications that may be of interest.

## **05. How We Use Your Personal Information**

- 5.1. We determine the legal basis for processing your personal information in accordance with this Privacy Policy to ensure compliance with applicable laws.
- 5.2. Pre-Registration Data Processing: For personal data processed before Members register on the EWG Platform, such as when an existing Member shares a referral link with you before you have registered.
- 5.3. Sharing with Other Members: Your personal information may be shared with other EWG Members as part of our network activities. If you withdraw your consent, you may no longer be able to engage fully with the EWG Platform. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- 5.4. Post-Withdrawal Use of Information: In certain circumstances, personal information may continue to be used post-withdrawal of consent, for example, if there are unresolved issues or claims that require investigation or resolution.
- 5.5. Member Engagement: When you engage with investment opportunities through the EWG Platform, it is necessary to process your personal information to fulfill our contractual obligations and ensure compliance with the operational standards of EWG.

- 5.6. Legal and Regulatory Compliance: We may be required to process your personal information to comply with legal obligations, such as in response to a legal request from law enforcement or other government agencies.
- 5.7. Public Interest: In certain limited circumstances, we may process personal information to perform tasks carried out in the public interest, such as participating in regulatory actions or investigations related to financial activities within the scope of EWG operations.

## **06. How And Why We Share Your Personal Information**

- 6.1. EWG may share your personal information within our corporate group for internal administrative purposes. This includes but is not limited to ensuring consistent service quality, corporate strategy alignment, compliance with regulatory requirements, and conducting research and development. These activities are conducted under the basis of our legitimate interests.
- 6.2. Sharing with Third Parties: We collaborate with various third-party service providers and partners to enhance our services. This may include:
  - 6.2.1. Payment processors and banking institutions for financial transactions.
  - 6.2.2. IT and cloud service providers for data management and storage.
  - 6.2.3. Legal and security consultants for ensuring compliance with applicable laws and regulations.
- 6.3. Third parties that receive personal information from EWG are obligated to protect it and are restricted from using such information for purposes beyond what is specified in our service agreements with them.
- 6.4. We may disclose your personal information:
  - 6.4.1. To facilitate business development such as mergers, acquisitions, or asset sales.

- 6.4.2. In response to legal requests or to comply with legal obligations.
- 6.4.3. To protect the rights and safety of EWG, our members, and third parties, especially in situations that involve potential threats or fraud.
- 6.5. We may use and share anonymised or aggregated data with third parties for analytical and strategic purposes. This data does not reveal your identity and is used to understand Member trends and enhance service offerings.
- 6.6. We do not sell, rent, or trade your personal information with third parties without your explicit consent. If you have consented to a specific use of your personal information, you have the right to withdraw this consent at any time. To withdraw consent or discuss the processing of your information, please contact us directly.

## **07. How Long We Store Your Personal Information**

- 7.1. We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights. Please contact us for more specifics.

## **08. Your Rights**

- 8.1. You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at [legals@effortlesswealthgroup.com](mailto:legals@effortlesswealthgroup.com).
- 8.2. You have the following rights:
  - 8.2.1. Right of access - You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used;

and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").

- 8.2.2. Right to update your information - You have a right to request an update to any of your personal information which is out of date or incorrect.
- 8.2.3. Right to delete your information - You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us via email at [legals@effortlesswealthgroup.com](mailto:legals@effortlesswealthgroup.com).
- 8.2.4. We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, using the email address above.
- 8.2.5. Right to restrict use of your information - You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us via email at [legals@effortlesswealthgroup.com](mailto:legals@effortlesswealthgroup.com).
- 8.2.6. We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, using the email address above.
- 8.2.7. Right to stop marketing - You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- 8.2.8. Right to data portability - You have a right to ask us to provide your personal information to a third-party provider of services.
- 8.2.9. This right only applies where we use your personal information based on your consent or performance of a contract and where our use of your information is carried out by



an automated process.

8.2.10. Right to object - You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information based on our, or another person's legitimate interest.

8.3. We will consider all such requests and provide our response within a reasonable period (and in any event within 30 days of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

8.4. If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

## **09. Marketing Use**

9.1. We may collect and use your personal information for undertaking marketing by email, social media, telephone and/or post.

9.2. We may send you certain marketing communications (including electronic marketing communications to existing Members) if it is in our legitimate interests to do so for marketing and business development purposes.

9.3. However, we will obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

9.4. If you wish to stop receiving marketing communications, you can unsubscribe, change your marketing preferences or contact us via email at [legals@effortlesswealthgroup.com](mailto:legals@effortlesswealthgroup.com).

## 10. How We Keep Your Personal Information Secure

- 10.1. EWG is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through the use of appropriate organisational and technical measures.
- 10.2. These rules describe how keep your data secure:
  - 10.2.1. When data is stored on paper, it is be kept in a secure place where unauthorised people cannot see it;
  - 10.2.2. When not required, the paper or files should be kept in a locked drawer or filing cabinet;
  - 10.2.3. Employees should make sure paper and printouts are not left where unauthorised people could see them (e.g. on a printer);
  - 10.2.4. Data printouts should be shredded and disposed of securely when no longer required and within 5 working days;
  - 10.2.5. When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts;
  - 10.2.6. Data should be protected by strong password authentication that are changed regularly and never shared between employees;
  - 10.2.7. If data is stored on removable media (e.g. a Data Stick or DVD), these should be kept securely locked away when not being used;
  - 10.2.8. Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing service;
  - 10.2.9. Servers containing personal data should be located in a secure place away from

general office space;

10.2.10. Data should be backed up frequently and tested regularly, in line with company standard backup procedures;

10.2.11. If data is stored to laptops, smartphone or tablets it should be deleted as soon as possible after it has been used and, in any event, no longer than 12 hours after the data has been received; and

10.2.12. All servers and computers containing data should be protected by approved security software and a firewall.

10.3. During provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure.

10.4. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our Platform and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

10.5. Where we have given you, or where you have chosen, a password which enables you to access your profile and account on our Platform, you are responsible for keeping this password private and confidential. Please do not share your password with anyone.

## **11. Cookies**

11.1. Some pages on our Platform use cookies, which are small files placed on your internet browser when you visit our Platform. We use cookies to offer you a more tailored experience in the future, by understanding and remembering your browsing preferences.

11.2. Our Platform uses cookies to distinguish you from other Members of our Platform. This helps us to provide you with a better experience when you browse our Platform and allows us to improve

our site.

- 11.3. Where we use cookies on our Platform, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our Platform or to use all the functionality and services provided through our Platform.
- 11.4. We use third party analytics providers to collect information about your use of our Platform, this allows us to improve how our service works. The information allows us to see the overall patterns of usage on our site and helps us record any difficulties you have with it.
- 11.5. These third-party analytics providers use cookies and other, similar technologies to collect information about the use of the site and to report statistics and trends to us without identifying you individually.
- 11.6. More information can be found by reviewing our Cookie Policy.

## **12. Links To Other Websites**

- 12.1. Our Platform may contain hyperlinks to other websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This Privacy Policy only applies to the personal information that we collect or which we receive from third-party sources, and we cannot be responsible for personal information about you that is collected and stored by third-parties.

## **13. Changes To Our Privacy Policy**

- 13.1. We may update our Privacy Policy from time to time. Any changes we make to our Privacy Policy in the future will be updated on this page with the 'Last Updated' date amended and, where appropriate, we will notify you by post or email.

## **14. Further Questions And How To Make A Complaint**

- 14.1. If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact [legals@effortlesswealthgroup.com](mailto:legals@effortlesswealthgroup.com).
- 14.2. You may also make a complaint to the Information Commissioner's Office (ICO), or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation (GDPR) has taken place.

**END OF PRIVACY POLICY**

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