

## Privacy, Data Use and Retention Policy

### 1. INTRODUCTION

API Connect Ltd (trading as LDB-X), company number 13550449 is a data processor in respect of personal information that we process in connection with our business (including the products and services that we provide through the LDB-X app and website). In this notice, references to “we”, “us” or “our” are references to LDB-X.

Your privacy is important to LDB-X, and we have taken steps to ensure that you are comfortable with how we use your personal information. This Privacy Notice is designed to comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), and, where applicable, the European Union General Data Protection Regulation (EU GDPR).

Our privacy email address for all LDB-X inquiries and Data Protection Officer (DPO) matters is [Support@nfc.money](mailto:Support@nfc.money). We respect individuals' rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect, use, and legally protect personal information in connection with our business.

“Personal data” means any information relating to an identified or identifiable natural person. We may update our Privacy Notice from time to time. When we do, we will communicate any changes to you and publish the updated Privacy Notice on our website.

### 2. WHAT INFORMATION WE COLLECT

We collect and process various categories of personal information at the start of, and for the duration of, your relationship with us. We limit the collection and processing to information necessary to achieve one or more legitimate purposes. Personal data may include:

A. Basic personal information: Identity Data such as your full name, address, e-mail, phone number, date of birth, and personal identity documents (ID, passport, or other) required for Know Your Customer (KYC) checks.

B. Financial information: Your financial and credit card information, bank account details, billing contact email address, VAT number, and transactional history.



C. Goods and services we provide to you.

D. Online profile and technical data: Internet Protocol (IP) address, smart device information, location data, online and mobile app security authentication, and mobile phone network details.

We may also process certain special categories of personal data (e.g., biometric data such as facial recognition) strictly for identity verification, preventing financial crime, and ensuring compliance with Anti-Money Laundering (AML) regulations, provided we have obtained your explicit consent or are otherwise legally permitted under Article 9 of the GDPR.

### 3. LAWFUL BASIS FOR PROCESSING (UK & EU GDPR)

Under UK and EU Data Protection laws, we must have a valid lawful basis to process your personal data.

#### **We rely on the following bases:**

- Contractual Necessity: To provide our services to you, fulfill our Terms and Conditions, and manage your account.
- Legal Obligation: To comply with statutory requirements, including UK and international AML, Counter-Terrorism Financing (CTF) regulations, and tax reporting laws.
- Legitimate Interests: To improve our products, detect and prevent fraud, ensure IT security, and conduct statistical analysis, provided your fundamental rights do not override these interests.
- Consent: Where you have provided clear consent for us to process your personal data for a specific purpose (e.g., direct marketing or processing biometric data). You have the right to withdraw this consent at any time.

### 4. SOURCES OF INFORMATION

#### **Your information is collected from the following sources:**

- A. Directly from you (e.g., when you register an account, fill out forms, or contact support).
- B. Through your use of our services (e.g., transaction history, patterns, and technical data).
- C. From third parties (e.g., fraud prevention agencies, public registers, and identity verification partners).

### 5. HOW WE USE YOUR INFORMATION

We will only use your information where it is necessary for us to lawfully carry out our business activities. Your information may be shared with and processed by other companies within the LDB-X corporate group to facilitate service provision, ensure security, and maintain regulatory compliance.

If we change the way we use your information, and where we believe you may not reasonably expect such a change, we will notify you in advance, allowing you the opportunity to exercise your rights under GDPR.

## 6. DATA SHARING & INTERNATIONAL TRANSFERS

We will not share your information with anyone outside of LDB-X except:

- A. Where we have your explicit permission.
- B. With third-party service providers (processors) who help us operate our business (e.g., cloud hosting, identity verification, payment gateways). We ensure strict Data Processing Agreements (DPAs) are in place.
- C. Where required by law, the Financial Conduct Authority (FCA), the Information Commissioner's Office (ICO), or other relevant regulatory or law enforcement agencies.

International Transfers (UK/EEA Data):

Because LDB-X operates globally, your data may be transferred to, and stored at, a destination outside the UK or the European Economic Area (EEA). Whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We transfer data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government or European Commission.
- We use specific contracts approved for use in the UK/EEA (such as the ICO's International Data Transfer Agreement (IDTA) or the EU Standard Contractual Clauses (SCCs)) which give personal data the same protection it has within the UK/EEA.

## 7. MARKETING INFORMATION

We may use your personal information to send you marketing communications based on your consent or our legitimate interests.

You can opt-out (withdraw consent) at any time:

- Emails: By clicking "unsubscribe" in any marketing email.
- Text messages: By texting "STOP".
- By contacting us directly at [Support@nfc.money](mailto:Support@nfc.money).

## 8. DATA RETENTION

We retain your personal data only for as long as necessary to fulfill the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements.

- Typically, customer data is retained for the duration of the business relationship.
  - Under UK AML regulations, we are required by law to retain basic identity, KYC, and transactional data for a minimum of 5 years after the termination of the business relationship.
- In some cases, data may be retained longer if required by a court order, law enforcement investigation, or regulatory instruction. To determine appropriate retention periods, we consider the amount, nature, and sensitivity of the data, along with the purposes of processing.

## 9. YOUR GDPR & UK DATA PROTECTION RIGHTS

Under the UK GDPR and EU GDPR, you possess several powerful rights regarding your personal data:

- Right to be Informed: You have the right to be informed about the collection and use of your personal data (fulfilled by this notice).
- Right of Access: You can request a copy of the personal data we hold about you (Data Subject Access Request).
- Right to Rectification: You can request that we correct incomplete or inaccurate data.
- Right to Erasure ('Right to be Forgotten'): You can ask us to delete or remove personal data where there is no legal compelling reason for us to continue processing it (note that legal AML obligations may supersede this right in certain cases).
- Right to Restrict Processing: You can ask us to suspend the processing of your personal data under certain scenarios.
- Right to Data Portability: You can request the transfer of your data to you or a third party in a structured, machine-readable format.
- Right to Object: You can object to processing based on legitimate interests or for direct marketing purposes.
- Rights regarding Automated Decision-Making: You have rights relating to automated decision-making and profiling.

To exercise any of these rights, please contact our privacy team at [Support@nfc.money](mailto:Support@nfc.money).

## 10. COMPLAINTS TO THE ICO AND EU AUTHORITIES

We take your data privacy seriously. If you have any concerns about our use of your personal information, you can make a complaint to us at [Support@nfc.money](mailto:Support@nfc.money).

UK Residents: You have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

ICO Contact Details:

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

Helpline number: 0303 123 1113

Website: <https://ico.org.uk>

EU Residents: If you are based in the European Union, you have the right to lodge a complaint with the local data protection supervisory authority in your country of residence, place of work, or where the alleged infringement took place.

## 11. CONTACT INFORMATION

**Data Controller:** API Connect Ltd (trading as LDB-X)

**Company Number:** 13550449

**Registered Address:** 69 Wilson Street, London, England, EC2A 2BB

**Email:** [Support@nfc.money](mailto:Support@nfc.money)