# Privacy Policy

**Neofin Global Inc.** – version 2.0, effective 17 November 2026 (replaces the version of 20 June 2022)

This Privacy Policy explains how Neofin Global Inc. ("Neofin", "we", "us") collects and uses personal data when you visit our website neo-fin.com, contact us, book a demo, work with us as a client, prospect, partner or supplier, or make a request about your personal data. It is written to meet the information requirements of the EU and UK General Data Protection Regulation (GDPR), Articles 12–14.

## 1. Who we are and how to contact us

The controller of the personal data described in this policy is **Neofin Global Inc.**, 919 North Market Street, Suite 950, Wilmington, Delaware 19801, USA.

For any privacy question or to exercise your rights, contact us at **support@neofin.global** or use our Data Subject Request form (see section 8). Business enquiries can also be sent to office@neo-fin.com.

## 2. Personal data processed in the Neofin platform

Neofin provides a credit and lending automation platform to banks, lenders and other businesses (our clients). When our clients use the platform to process data about their own customers (for example loan applicants), the client is the controller of that data and Neofin acts as its processor, under a written agreement and only on the client's instructions. The client's own privacy notice explains that processing. If you are a customer of one of our clients, please send requests about your data to that client; we will assist them in responding.

## 3. Personal data we collect

- **Contact and identity data:** first and last name, email address, phone number, company, job title.
- **Enquiry and meeting data:** the content of messages you send through our contact form or by email, and demo bookings (date, time, contact details and any notes you add).
- **Business relationship data:** contact details of client, partner and supplier representatives, contract, billing and correspondence records.
- **Request data:** details you give us when you exercise your data protection rights, and the record of how we handled the request.
- **Technical data:** IP address, browser and device information and security logs generated when you use our website, including the reCAPTCHA check on our contact form.

We collect this data directly from you, except technical data, which is generated automatically when you use our website. We do not collect special categories of personal data through our website.

## 4. Why we use your data and our legal basis

| Purpose | Personal data | Legal basis (GDPR Art. 6(1)) |
|---|---|---|
| Responding to enquiries and demo requests | Contact, enquiry and meeting data | Steps at your request before entering into a contract (b); our legitimate interest in answering business enquiries (f) |
| Providing our services and managing client, partner and supplier relationships, including billing | Contact, business relationship data | Performance of a contract (b) |
| Sending service updates and information about our products to business contacts | Contact data | Legitimate interest (f), or consent (a) where required by law; you can opt out at any time |
| Keeping our website and services secure and preventing spam and fraud | Technical data | Legitimate interest in security (f) |

| Purpose | Personal data | Legal basis (GDPR Art. 6(1)) |
|---|---|---|
| Handling data protection requests | Request data | Legal obligation (c) |
| Accounting, tax and other legal obligations; establishing or defending legal claims | Business relationship data | Legal obligation (c); legitimate interest (f) |

Where we rely on legitimate interests, we have balanced them against your rights; you can object at any time (section 8). We do not make decisions about you based solely on automated processing, including profiling, in relation to the data covered by this policy.

## 5. Who we share your data with

We share personal data only as needed for the purposes above, with:

- service providers acting on our behalf under data processing terms: cloud hosting (Amazon Web Services), email and productivity tools (Google Workspace), network security and content delivery (Cloudflare), payments (Stripe), meeting scheduling, and compliance management;
- professional advisers such as lawyers, auditors and accountants, under confidentiality obligations;
- public authorities, courts or regulators where required by law.

We do not sell personal data.

## 6. International transfers

Neofin is a US company and some of our service providers are located in the United States or other countries outside the European Economic Area (EEA) and the UK. Where personal data is transferred outside the EEA or UK to a country without an adequacy decision, we rely on the European Commission's Standard Contractual Clauses (and the UK Addendum where applicable) included in our providers' data processing agreements, or on the recipient's certification under the EU-US Data Privacy Framework. You can request a copy of the relevant safeguards by contacting us.

## 7. How long we keep your data

| Data | Retention period |
|---|---|
| Enquiries and demo requests that do not lead to a business relationship | 24 months after our last contact |
| Client, partner and supplier records | For the duration of the relationship and up to 6 years after it ends, to meet accounting, tax and legal obligations |
| Data protection requests and our responses | 3 years after the request is closed |
| Website security and access logs | Up to 12 months |

When the retention period ends, we delete or anonymise the data in line with our Data Retention Policy.

## 8. Your rights

Subject to the conditions in the GDPR, you have the right to:

- access your personal data and receive a copy of it;
- have inaccurate data corrected and incomplete data completed;
- have your data erased;
- restrict the processing of your data;
- receive your data in a portable format;
- object to processing based on legitimate interests, and to direct marketing at any time;

- withdraw your consent at any time, where we rely on consent, without affecting processing carried out before withdrawal;
- lodge a complaint with a data protection supervisory authority, in particular in the EU or UK country where you live or work or where the alleged infringement took place.

To exercise your rights, use our Data Subject Request form or email **support@neofin.global**. We may ask you to verify your identity. We respond within one month of receiving your request; this can be extended by up to two further months for complex or numerous requests, in which case we will tell you within the first month. Requests are free of charge unless they are manifestly unfounded or excessive.

## 9. Security

We protect personal data with technical and organisational measures that include encryption, access control, logging and monitoring, backups, staff confidentiality obligations and training. Our information security management system is certified to ISO/IEC 27001.

## 10. Children

Our website and services are intended for businesses and are not directed at anyone under 18. We do not knowingly collect personal data from children.

## 11. Changes to this policy

We review this policy at least annually and when our processing changes. The current version is always published on our website with its effective date. We will notify clients of material changes by email.

## Version history

| Version | Date | Change |
|---|---|---|
| 1.0 | 20 June 2022 | First published version |
| 2.0 | 17 November 2026 | Revised for GDPR Articles 12–14: controller details, legal basis for each purpose, controller/processor roles, recipients, international transfer safeguards, retention periods, data subject rights and response times, supervisory authority complaints |