

WealthAi

AI-Powered Operating System for Wealth Managers

PRIVACY & INFORMATION SECURITY POLICY

Date	1 July 2026
Version	1.0
Owner	WealthAi Technology Limited (Company No. 15164982)
Applies to	Website visitors, prospective customers, job applicants and other individuals whose data WealthAi processes as controller
Related documents	Data Processing Addendum v1.0 Master Services Agreement Acceptable Use Policy v1.0

WealthAi Technology Limited ("WealthAi", "we", "us" or "our") is committed to protecting the privacy and security of personal information. This Privacy & Information Security Policy ("Policy") explains how we collect, use, protect and share personal data when individuals interact with our website (wealthai.tech), contact us, apply for roles, or otherwise engage with us as a prospective or current counterparty.

This Policy applies to WealthAi acting as a data controller in its own right. It does not govern the processing of personal data that WealthAi carries out as a data processor on behalf of its clients — that processing is covered by the Data Processing Addendum ("DPA"), which is incorporated into the Master Services Agreement with each client.

We process personal data in accordance with the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 ("DPA 2018"), and all other applicable data protection and privacy law.

1. Who We Are

1.1 WealthAi Technology Limited is registered in England and Wales under company number 15164982. We are an AI-native wealth management platform providing an operating system for family offices, private banks and wealth managers.

1.2 For the purposes of UK GDPR, WealthAi is the data controller in respect of the personal data described in this Policy.

1.3 Our registered office is at Kingfisher House, Hurstwood Grange, Hurstwood lodge, Haywards Heath, RH17 7QX. Our data protection contact is: privacy@wealthai.tech.

2. Personal Data We Collect

2.1 Website Visitors

2.1.1 When you visit wealthai.tech, we may automatically collect:

- Technical data: IP address, browser type and version, operating system, device identifiers, and referring URL
- Usage data: pages visited, time on site, links clicked, and session duration
- Cookie data: as described in Section 7 below

2.2 Enquiries and Prospective Customers

2.2.1 When you contact us — whether via the website, email, telephone, or at events — we collect:

- Identity data: name, job title, and company name
- Contact data: email address and telephone number
- Communication data: the content of your messages and our responses
- Commercial data: information about your firm's size, regulatory status, and technology needs, to the extent you share this with us

2.3 Job Applicants

2.3.1 If you apply for a position with WealthAi, we collect:

- Identity, contact and employment history data provided in your CV, covering letter and application form
- Assessment and interview notes generated during the recruitment process
- Right to work documentation where an offer is made

2.4 Investors, Advisers and Other Counterparties

2.4.1 In the course of our corporate and commercial activities, we may collect identity, contact and financial data relating to investors, legal advisers, accountants and other professional counterparties, to the extent necessary to manage those relationships.

2.5 Data We Do Not Collect as Controller

2.5.1 WealthAi does not collect special category personal data (such as health, biometric or political data) about website visitors or prospective customers. We do not knowingly collect personal data from children under 16.

3. How and Why We Use Personal Data

The table below summarises our main processing activities, the purposes for which we use personal data, and the lawful basis under UK GDPR.

Purpose	Activities	Lawful basis
Respond to enquiries	Managing inbound contact from prospective customers, partners and press	Legitimate interests (pre-contractual engagement)
Product demonstration and sales	Providing platform demonstrations; following up on commercial interest	Legitimate interests; pre-contractual steps

Purpose	Activities	Lawful basis
Contract performance	Onboarding clients; managing the MSA relationship	Performance of contract
Recruitment	Shortlisting, interviewing and assessing job applicants	Legitimate interests; legal obligation (right to work)
Website operation and security	Maintaining, improving and securing wealthai.tech; fraud prevention	Legitimate interests
Marketing communications	Sending news, product updates and event invitations to business contacts who have opted in or with whom we have an existing relationship	Consent; legitimate interests (soft opt-in)
Legal and regulatory compliance	Complying with applicable law, responding to regulatory requests, enforcing our agreements	Legal obligation; legitimate interests
Corporate transactions	Managing relationships with investors, advisers and other corporate counterparties	Performance of contract; legitimate interests

3.1 We will not use your personal data for purposes incompatible with those stated above without first providing notice and, where required, obtaining consent.

4. Sharing Personal Data

4.1 WealthAi does not sell personal data. We may share personal data only in the following circumstances:

- Service providers and technology partners: cloud hosting providers, CRM, email delivery, and analytics tools who process data on our behalf under appropriate data processing agreements
- AI infrastructure providers: where we use third-party AI model APIs (such as those provided by Anthropic or similar), data transmitted to those APIs is subject to applicable contractual safeguards and is not used to train third-party models
- Professional advisers: solicitors, accountants, auditors and insurers bound by confidentiality obligations
- Regulatory and law enforcement authorities: where required by law or court order, or where necessary to protect the rights, property or safety of WealthAi, its clients or others
- Corporate transactions: in connection with a merger, acquisition, investment round or other corporate event, subject to appropriate confidentiality obligations

4.2 We require all third parties with whom we share personal data to respect its security and to process it only for specified, lawful purposes.

5. International Data Transfers

5.1 WealthAi's primary operations and data storage are based in the United Kingdom and European Economic Area. Where we transfer personal data outside the UK or EEA, we ensure that an appropriate transfer mechanism is in place, including:

- An adequacy decision issued under Article 45 UK GDPR

- UK International Data Transfer Agreements (IDTAs) or EU Standard Contractual Clauses incorporating the UK Addendum
- Any other mechanism recognised as lawful under UK GDPR

5.2 Details of the transfer mechanisms we rely on are available on request at privacy@wealthai.tech.

6. How Long We Keep Personal Data

6.1 We retain personal data only for as long as necessary for the purpose for which it was collected, subject to any legal or regulatory obligation to retain it for a longer period.

6.2 Our general retention approach is:

- Website and analytics data: 12 months from collection, unless anonymised earlier
- Enquiry and pre-sales data: 2 years from last meaningful contact, unless a customer relationship develops
- Customer and contractual data: for the duration of the contract and 7 years thereafter (Companies Act and HMRC requirements)
- Recruitment data: 6 months from the date a role is filled (unsuccessful applicants); 7 years from the end of employment (successful applicants)
- Investor and corporate counterparty data: for the duration of the relationship and 7 years thereafter

6.3 At the end of the applicable retention period, personal data is securely deleted or anonymised.

7. Cookies and Website Tracking

7.1 Our website uses cookies and similar technologies. We use:

- Strictly necessary cookies: required for the website to function and cannot be disabled (no consent required)
- Analytics cookies: used to understand how visitors use our site (e.g. page views, session duration). These are only set with your consent
- Preference cookies: used to remember your settings and preferences. These are only set with your consent

7.2 We do not use advertising or tracking cookies that follow you across third-party websites.

7.3 You can manage your cookie preferences at any time through our cookie consent banner or your browser settings. Withdrawing consent will not affect the lawfulness of processing before withdrawal.

8. Your Data Protection Rights

8.1 Under UK GDPR, you have the following rights in relation to personal data we hold about you:

- Right of access: to request a copy of the personal data we hold about you (Article 15)
- Right to rectification: to request correction of inaccurate or incomplete data (Article 16)
- Right to erasure: to request deletion of your data in certain circumstances (Article 17)

- Right to restriction: to request that we restrict processing of your data in certain circumstances (Article 18)
- Right to data portability: to receive your data in a structured, machine-readable format in certain circumstances (Article 20)
- Right to object: to object to processing based on legitimate interests or for direct marketing purposes (Article 21)
- Rights related to automated decision-making: not to be subject to a decision based solely on automated processing that produces legal or similarly significant effects (Article 22)

8.2 To exercise any of these rights, please contact us at privacy@wealthai.tech. We will respond within one calendar month. There is no charge for exercising your rights in most circumstances.

8.3 If you are unsatisfied with how we handle a rights request or any other aspect of our data processing, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

9. Information Security

9.1 Our Security Principles

9.1.1 WealthAi is an AI-native financial technology company operating in a regulated environment. We apply the following core information security principles across all our operations:

- Confidentiality: personal and commercially sensitive data is accessible only to those with a legitimate need to access it
- Integrity: data is protected against unauthorised alteration or corruption
- Availability: systems and data are accessible to authorised users when needed, with resilience against outages and incidents
- Accountability: we maintain records of our processing activities, security decisions and incident responses

9.2 Technical Measures

9.2.1 Our platform and infrastructure apply the following technical controls:

- Encryption of data at rest (AES-256) and in transit (TLS 1.3 minimum) for all personal and client data
- Role-based access controls and the principle of least privilege for all internal systems
- Multi-factor authentication mandatory for all staff accessing production and client-facing systems
- Cloud infrastructure hosted on certified providers within the UK/EEA, meeting ISO 27001 standards
- Continuous monitoring, alerting, and intrusion detection across our infrastructure
- Regular independent penetration testing (at least annually) and vulnerability scanning (quarterly)
- Secure software development lifecycle incorporating security review at each release stage

9.3 Organisational Measures

9.3.1 We complement our technical controls with the following organisational measures:

- A formal Information Security Policy, reviewed at least annually by senior management

- Mandatory data protection and information security training for all staff on joining and at least annually thereafter
- Background checks for all personnel with access to personal or client data
- A dedicated data protection contact responsible for overseeing UK GDPR compliance
- A documented incident response plan, tested at least annually
- Business continuity and disaster recovery plans providing a Recovery Time Objective (RTO) of 4 hours and Recovery Point Objective (RPO) of 1 hour for critical systems

9.4 AI-Specific Security Measures

9.4.1 Given the AI-native nature of our platform, we apply additional controls:

- Logical and technical separation between production personal data and any data used in model development or testing environments
- AI model outputs are treated as decision-support tools; no automated output is acted upon without human review in a regulated context
- Third-party AI infrastructure providers are subject to contractual controls preventing use of client or personal data for model training
- Prompt injection and adversarial input protections are applied to all customer-facing AI interfaces

9.5 Security Incidents

9.5.1 In the event of a personal data breach affecting data we control, we will:

- Notify the Information Commissioner's Office within 72 hours of becoming aware, where the breach is likely to result in a risk to individuals' rights and freedoms
- Notify affected individuals without undue delay where the breach is likely to result in a high risk to their rights and freedoms
- Document all incidents, remediation steps and lessons learned

9.5.2 To report a suspected security vulnerability or incident involving WealthAi systems, please contact: security@wealthai.tech.

10. Third-Party Websites and Services

10.1 Our website may contain links to third-party websites or integrate with third-party services. This Policy does not apply to those third parties. We encourage you to review the privacy policies of any third-party services you use.

10.2 We are not responsible for the privacy practices or content of third-party websites, even where we have linked to them.

11. Marketing Communications

11.1 We may send marketing communications to business contacts where we have obtained consent, or where we have an existing business relationship and the communication is relevant to similar products or services (soft opt-in under PECR).

11.2 You can opt out of marketing communications at any time by clicking the unsubscribe link in any email, or by emailing privacy@wealthai.tech. Opting out will not affect other communications we need to send you in connection with a contract or legal obligation.

12. Changes to This Policy

12.1 We may update this Policy from time to time to reflect changes in our practices, technology, legal requirements or for other operational reasons. We will post the updated Policy on our website with a revised effective date. Where changes are material, we will take reasonable steps to notify affected individuals.

12.2 The latest version of this Policy is always available at <https://wealthai.tech/download/privacy-information-security-policy/>.

13. Contact Us

13.1 If you have any questions about this Policy, wish to exercise your data protection rights, or want to raise a concern about our data practices, please contact us:

Data protection enquiries	privacy@wealthai.tech
Security incidents & vulnerabilities	security@wealthai.tech
General enquiries	sales@wealthai.tech
Postal address	WealthAi Technology Limited, Kingfisher House, Hurstwood Grange, Hurstwood Lane, Haywards Heath, West Sussex, England RH17 7QX

Annex — Key Terms

Term	Meaning
Controller	An entity that determines the purposes and means of the processing of personal data. WealthAi is the controller for the processing described in this Policy.
Cookie	A small text file placed on your device by a website to store information about your visit.
DPA 2018	The Data Protection Act 2018.
ICO	The Information Commissioner's Office — the UK's independent supervisory authority for data protection.
Personal data	Any information relating to an identified or identifiable natural person.
Processor	An entity that processes personal data on behalf of a controller. WealthAi acts as processor for its clients under the Data Processing Addendum.
Special category data	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, biometric or genetic data.
UK GDPR	The UK General Data Protection Regulation — the retained EU law version of the GDPR as it applies in the United Kingdom.

Term	Meaning
WealthAi	WealthAi Technology Limited (Company No. 15164982), registered in England and Wales.

WealthAi Technology Limited | privacy@wealthai.tech | wealthai.tech/privacy