

## PRIVACY POLICY

Valid From: 11.04.2025, Version 8

Applicable to: BWT Trading Ltd. and its Funding & Credit Advisory Services

### 1. General Provisions

1.1. This Privacy Policy applies to the processing of personal data collected via the BWT Trading Ltd. T/A Capwynn Financial website, forms, client portals, communications, and services.

1.2. Capwynn Ltd. is a private limited company registered in England and Wales. Registered office: 45 Fitzroy Street, Fitzrovia, London, W1T 6EBJ.

1.3. We are committed to safeguarding the privacy of our website visitors, clients, and users of our funding and credit advisory services.

1.4. This policy sets out how we will treat your personal information in accordance with applicable laws, including the UK General Data Protection Regulation (UK GDPR).

### 2. What Information We Collect

We may collect, store, and use the following kinds of personal data:

- Information about your computer and about your visits to and use of this website (including IP address, geographical location, browser type, referral source, length of visit, and number of page views)
- Information that you provide to us for the purpose of registering with us or subscribing to our services (name, email address, phone number, company name, company registration number, financial data)
- Information relating to any transactions carried out between you and us, including information relating to any purchases or services you make
- Information you provide for funding assessments, credit profile reviews, or during consulting engagements (including uploaded documents such as bank statements, ID, proof of business activity)
- Any other information that you choose to send to us

### 3. Cookies

We use cookies on this website. A cookie is a text file sent by a web server to a web browser and stored by the browser. The cookie is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both session cookies and persistent cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website and to improve usability. We will use the persistent cookies to enable our website to recognise you when you visit.

Cookies may also be used for advertising performance (via tools like Facebook Pixel or LinkedIn Insight Tag) and for analytics purposes (via tools like Google Analytics).

You can manage your cookie preferences through your browser settings.

### 4. Use of Your Personal Data

Personal data submitted to us via this website or through our services will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- Administer the website and services
- Improve your browsing experience
- Enable your use of the services available on the website
- Send you general (non-marketing) commercial communications
- Send you email notifications you have specifically requested
- Provide third parties with statistical information about our users – but this information will not be used to identify any individual user
- Deal with enquiries and complaints made by or about you relating to the website or services
- Carry out funding and credit consultations
- Assess your eligibility for funding or advisory recommendations (including automated AI-based assessments and risk scoring)

We do not store or process payment card details directly.

## 5. Disclosures

We may disclose information about you to any of our employees, officers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes as set out in this privacy policy.

In addition, we may disclose your personal information:

- To the extent that we are required to do so by law
- In connection with any legal proceedings or prospective legal proceedings
- To establish, exercise, or defend our legal rights (including providing information to others for fraud prevention and reducing credit risk)

We will not, without your express consent, provide your personal information to any third parties for direct marketing purposes.

## 6. Security of Your Personal Data

We will take reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information.

We will store all the personal data you provide on secure (password- and firewall-protected) servers. All electronic transactions you make to or receive from us will be encrypted where possible.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential.

## 7. Your Rights

You may instruct us to provide you with any personal information we hold about you.

You may instruct us not to process your personal data for marketing purposes by email at any time. You may also request:

- Correction of incorrect personal data
- Deletion of your personal data (subject to legal exemptions)
- Data portability
- Withdrawal of consent (where applicable)

## 8. Third Party Websites

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

## 9. Policy Amendments

We may update this privacy policy from time to time by posting a new version on our website.

## 10. Contact

If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email at [info@capwynn.co.uk](mailto:info@capwynn.co.uk) or by post to Capwynn Ltd.,  
Silverstream House  
45 Fitzroy Street  
Fitzrovia  
London  
W1T 6EB.