
Privacy Policy

This Privacy Policy constitutes a legal agreement between you, as the user of the Website, and Threedeeemee Limited as the owner of the Website. Throughout this Privacy Policy we will refer to you as “you”, and we will refer to Threedeeemee Limited as “we”, “us” or “Threedeeemee”.

1. Application

This Privacy Policy sets out the principles governing our use of your Personal Data (we define the term “Personal Data” below). It applies to you as soon as you first use the Website and anyone on our mailing list, and you are deemed to have agreed to be bound by it upon your first use of the Website. If you do not wish to continue to be bound by this Privacy Policy, please stop using the Website now and or click unsubscribe of any mailing list advertisements we may send you.

2. Relationship to Other Agreements

In addition to this Privacy Policy, apply to you and everyone else who uses the Website and mailing list. We refer to the Privacy Policy together as the “Website and mailing list Agreements”.

During the course of your use of the Website, you may choose to agree to be bound by certain other agreements: for example, if you wish to sign up to Threedeeemee, you will need to agree to a Membership Agreement, and if you wish to invest in threedeeemee through Threedeeemee, you will need to agree to the relevant Investment Agreements as laid down in the Articles of Association and the Subscription and Shareholders Agreement. We refer to all these other agreements as the “Platform Agreements”, because rather than just governing your technical use of the Website, they set out the substantive terms that govern your relationship with us when you make use of our platform.

The Website Agreements will continue to apply to you even after you have agreed to a Platform Agreement. However, if it turns out that there is a conflict between the Website Agreements and a Platform Agreement that you agree to, the Platform Agreement will take precedence.

3. Collecting Your Personal Data

When you use the Website, we may ask you to provide certain personal information, such as your proof of contact details: title, name, address, age, banking details, tax returns or other general information to confirm who you are, however we do not share this data with any third parties whatsoever.

4. Processing and Storing Your Personal Data

The principal purposes for which we process and store your Personal Data are:

To confirm your identity in order to create your account and ensure that you are eligible to use the services provided on the Website.

To conduct required anti-money laundering checks on you in connection with certain transactions you may conduct via the Website.

To process payments and investments in connection with the services provided on the Website.

In the case of investors looking to allocate capital, to confirm that you are eligible to make investments through the Website in accordance with relevant legislation.

To provide you with information about your account, including any campaign you have created and any investments or payments you have made.

To monitor, improve and administer the Website and the services provided on the Website.

To enable us to send you emails relating to updates on Threedeeemee, but if you DO NOT wish to receive such emails please click unsubscribe at the bottom of the updates.

To provide you with information about our business, and on other selected Threedeeemee products and services that we think may be of interest to you (unless you have asked us not to do so).

To measure, understand, or improve the effectiveness of advertising we provide to you is still relevant.

To enable us to comply with our legal and regulatory obligations, including reporting to regulators and governmental authorities.

To contact you to ensure customer satisfaction in respect of our role as a website provider and assist you in getting the best value from our service.

Full details of these purposes are set out in our notification to the Information Commissioner's Office under the UK Data Protection Act 1998, as well as the EU General Data Protection Regulation (GDPR) and other applicable laws.

Please note: Misrepresentation of yourself to gain access to the Threedeeemee Website or to gain access to restricted documents is considered a fraudulent offence and may carry criminal litigation against anyone who commits such an offence!

5. We Will Not Share Your Personal Data with anyone

Any of your Personal Data that is collected by Threedeeemee or its affiliates will be kept confidential by Threedeeemee and its affiliates, and we will not disclose it to any third parties. The only exceptions to this are:

We may disclose certain parts of your Personal Data if we are required to do so by law, regulation or the order of court or other legitimate government body or arbitration panel.

This includes, among other things, any Personal Data that may be requested by HM Revenue & Customs and the Financial Conduct Authority.

In the event that we intend to enter into a major corporate transaction, such as a sale of control of our or another business on a stock exchange, we may disclose certain of your Personal Data to potential buyers, underwriters or advisors. If we do this, we will take reasonable precautions to ensure that the recipients of your Personal Data are obligated to keep it confidential.

6. Changes of Business Ownership and Control

We may, from time to time, expand, reduce or sell our business, and this may involve the transfer of certain divisions or the whole business to other parties. Your Personal Data will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use your Personal Data for the purposes for which it was supplied by you.

7. Security of Your Personal Data

We endeavour to take all reasonable steps to protect your Personal Data, including the use of encryption technology. However, we cannot guarantee the security of any Personal Data you disclose online. In using the Website, you accept the inherent security implications of engaging in transactions online over the internet, and you agree that you will not hold us responsible for any breach of security unless we have been grossly negligent or in wilful default.

8. Use of Cookies

“Cookies” are small files that reside on your computer’s hard drive, generally contain an anonymous unique identifier and are accessible only by the website that placed them there and not any other sites.

Threedemee will not access Cookies on your computer. In addition, we will not gather information about you, including details of your operating system, browser version, domain name and IP address, and the details of any website you linked from to the Website.

We do not have third-party advertisements on the Website,

9. Communications between You and Threedemee

We only record email communication(s) between you and us in order to resolve queries in the future and for the purposes of ensuring security, staff training and complying with our regulatory and legal responsibilities.

In the case of communications by email you should note that, as emails are not encrypted (and may therefore be intercepted by third parties) and as the identity of the sender cannot be confirmed, you must NOT provide your security details by

email and should avoid providing any Personal Data to us by email unless specifically requested by us to do so.

10. Obtaining Copies of Your Personal Data

You can see some of the Personal Data we hold about you in the “Profile” section of your Threedemee account on the Website (if you are a Threedemee member).

In the event that you wish to see a copy of all of your Personal Data held by us, please write to:

The Threedemee Data Protection Officer

Threedemee Limited 71-75 Shelton Street Covent Garden London WC2H 9JG
United Kingdom

A request for a copy of your Personal Data should be accompanied with payment of a £10 administrative fee.

11. Changes to Your Personal Data

If you see that any of your Personal Data that is included in the “Profile” section of your Threedemee account is inaccurate, please revise or update it using the Website. Alternatively, if you believe that any of the Personal Data, we hold about you is inaccurate, you may write to us at the address given in paragraph 10 in order to correct it.

It is your responsibility to ensure that any Personal Data you have provided to us remains accurate and to notify us (either by the Website or by letter) if there are any changes in your Personal Data.

12. Severability

We have made every effort to ensure that this Privacy Policy adheres strictly with the relevant provisions of the UK Data Protection Act 1998 as well as the EU General Data Protection Regulation (GDPR) and other applicable laws. However, in the event that any of these provisions are found to be unlawful, invalid or otherwise unenforceable, this provision is to be deemed severed from this Privacy Policy and shall not affect the validity and enforceability of the rest of the Privacy Policy. This clause on “Severability” shall apply only within jurisdictions where a particular term is illegal.

13. No Waiver

In the event that either you or we fail to exercise any right or remedy contained in this Privacy Policy, that does not mean you or we (as applicable) have waived that right or remedy and so shall not be construed as a waiver.

14. Revisions

From time to time we may update this Privacy Policy to take account of changes in the law or for any other reason. If we update this Privacy Policy, we will post a new version on the Website, and as soon as you use the Website after they are posted, you will be deemed to have agreed to the updated version, but you will still be bound by the terms of any previous versions to which you have agreed or been deemed to agree. If there is a conflict between two versions of the Privacy Policy to which you have agreed or been deemed to agree, the more recent version shall take precedence unless it is expressly stated otherwise.

15. Communications

If you wish to communicate with us about anything related to this Privacy Policy, you may do so by sending a letter by first-class or registered post to our Data Protection Officer at the address given in paragraph 10.

16. Choice of Law

This Privacy Policy shall be governed by and construed in accordance with the laws of England and Wales.

17. Jurisdiction

You agree to submit to the exclusive jurisdiction of the courts of England and Wales. This means that if you want to bring a legal action against us, or we want to bring a legal action against you, it must be done in one of these courts.