

# PRIVACY POLICY

## Northern Gold Supply Ltd

*Last updated: 25/01/26*

### 1. Introduction

Northern Gold Supply Ltd (“we”, “us”, “our”, or the “Company”) is committed to protecting and respecting your privacy.

This Privacy Policy explains how we collect, use, store, and protect personal data when you interact with us, including through our website, email correspondence, and business dealings.

Northern Gold Supply Ltd is registered in England & Wales and processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

For the purposes of UK data protection law, Northern Gold Supply Ltd is the data controller in respect of personal data processed under this Privacy Policy.

Northern Gold Supply Ltd has not appointed a Data Protection Officer, as it is not required to do so under UK GDPR. All data protection matters are overseen by the Company’s Director.

### 2. Information We Collect

We may collect and process the following categories of personal data:

Information you provide directly

- Name and contact details
- Email address
- Enquiry and correspondence details
- Transaction-related information
- Identity verification documentation where required
- Source-of-funds information where required for compliance

Information collected automatically

- IP address
- Browser type and device information
- Website usage data collected via cookies or similar technologies

### 3. How We Use Your Information

We use personal data for the following purposes:

- Responding to enquiries and communications
- Providing quotations and facilitating transactions

- Conducting identity verification and compliance checks
- Meeting legal and regulatory obligations
- Preventing fraud and financial crime
- Improving our website and business operations

We do not use personal data for unsolicited marketing communications.

#### **4. Lawful Basis for Processing**

We process personal data under one or more of the following lawful bases:

- Performance of a contract or steps taken prior to entering a contract
- Compliance with legal and regulatory obligations
- Legitimate interests include operating the business effectively, preventing fraud, ensuring security, and maintaining compliance with applicable laws and regulations.
- Consent, where explicitly provided

#### **5. AML & KYC Compliance**

Northern Gold Supply Ltd operates in accordance with applicable UK anti-money laundering (AML) and counter-terrorist financing regulations.

As part of these obligations, we may be required to collect, verify, and retain personal information, including identity and source-of-funds documentation. Failure to provide such information may prevent us from proceeding with a transaction.

#### **6. Data Sharing**

We may share personal data where necessary with:

- Third-party wholesalers and suppliers for the purpose of fulfilling transactions
- Compliance, identity verification, and fraud prevention service providers
- Professional advisers such as legal or accounting firms
- Regulatory authorities, law enforcement agencies, or other bodies where required by law

We do not sell, rent, or trade personal data to third parties.

#### **7. Data Storage, Retention & Security**

Personal data is stored securely and accessed only by authorised persons.

We apply appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or disclosure.

Personal data is retained in accordance with the following general retention periods:

- Enquiry and correspondence records: retained for up to 24 months

- Client transaction records: retained for a minimum of 5 years following the completion of a transaction
- AML, KYC, and source-of-funds records: retained for a minimum of 5 years in accordance with legal and regulatory requirements

Data is securely deleted or anonymised once it is no longer required.

## **8. International Data Transfers**

Where personal data is transferred outside the United Kingdom, such transfers are made subject to appropriate safeguards in accordance with UK GDPR, including standard contractual clauses or equivalent legal mechanisms, where applicable.

## **9. Your Rights**

Under UK GDPR, individuals have the right to:

- Access personal data held about them
- Request correction of inaccurate or incomplete data
- Request erasure of personal data where applicable
- Restrict or object to processing in certain circumstances
- Request data portability
- Withdraw consent where processing is based on consent

Requests may be made by contacting us using the details below.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

## **10. Cookies**

Our website uses cookies and similar technologies to enhance functionality and analyse website usage.

Users may manage or disable cookies through their browser settings.

Further information is provided in the Company's Cookie Policy, available on the website where cookies are in use.

## **11. Changes to This Policy**

We may update this Privacy Policy from time to time. Any updates will be published on our website, and the revised version will take effect from the date shown above.

## **12. Contact Information**

For privacy-related enquiries and data protection requests, please contact:

Northern Gold Supply Ltd

Email: [enquiries@northerngoldsupply.com](mailto:enquiries@northerngoldsupply.com)

Registered in England & Wales

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