

Our Plain English Guide to Privacy & Cookies -

For Direct Users, Partners, and Their Clients

A Quick Note on This Policy

This guide covers a few different privacy situations because we provide our services in a few different ways. To keep things clear, let's define who's who:

- **You:** Anyone using our services or Platform.
- **Direct Users:** You signed up to use PocketCFO directly with us, without an intermediary accountant.
- **Partners:** You are an accounting firm using our Platform to serve your own clients.
- **Partner Clients:** You are a client of one of our Partners and use the client portal they provide.

This policy will explain how we handle information for each group. The key difference is our role under privacy law (like GDPR):

- **For Direct User & Partner data:** We (PocketCFO) are the main organisation in charge (the "**Data Controller**").
- **For Partner Client data:** Your Accountant (our Partner) is the main organisation in charge (the "**Data Controller**"). We (PocketCFO) simply process that data on their behalf (as a "**Data Processor**").

1. What This Policy Covers

This guide explains how your personal information is handled when using the portal and services provided by PocketCFO (that's us, The Financial Insights Company B.V.). It clarifies the roles for everyone involved.

2. Who to Contact

For any privacy questions, it's important to contact the right organisation.

- **If you are a Partner Client (a client of an accountant):**
 - Your primary contact is **Your Accountant**. As the Data Controller for your information, they are responsible for your data and can help you with most questions.
- **If you are a Direct User or a Partner:**
 - Your primary contact is **PocketCFO**. As the Data Controller for your information, you can contact us directly with any questions.
 - **PocketCFO.io (The Financial Insights Company B.V.)**
 - Europalaan 93, 3526 KP Utrecht, The Netherlands
 - hello@pocketcfo.io / KvK: 94 36 58 49



3. How and Why We Use Your Information

We handle information differently depending on our relationship with you.

A. When You Are a Direct User or Partner (PocketCFO as Controller)

When you sign up and use our services directly, we process your personal data as the Data Controller.

- **What we do and why:** We handle your data to:
 - Provide the Platform services to you.
 - Set up and manage your account.
 - Handle billing and payments.
 - Communicate with you about service updates, support, and marketing information.
 - Generate Automated Insights based on the content you provide.
 - Improve our Platform and services.
 - Meet our own legal duties (like for tax and company law).
- **Legal Basis:** We process this data because it's necessary for our service agreement with you, to meet legal requirements, or for our legitimate business interests (like improving our service).

B. When You Are a Partner's Client (PocketCFO as Processor)

When you use the Platform provided by your accountant, we process your info **on their behalf**.

- **What Your Accountant directs us to do:** Your Accountant (the Data Controller) uses the Platform and instructs us to process your data so they can provide their services to you. Our role is limited to running the technology that makes this possible (e.g., letting you log in, upload files, and see your data).

4. What Information We Handle

A. Information We Collect as a Data Controller

This is the data we collect from our **Direct Users** and **Partners**:

- **Account & Contact Details:** Your name, email address, and phone number. For Partners, this includes the details of your staff who use the Platform.
- **Business Information:** Your company name, address, activities, and KvK number.
- **Financial Info & Documents (for Direct Users):** Data, invoices, receipts, and bank statements you upload or link to use the service.
- **Billing Information:** Bank details and transaction history for paying for our

Version August 2025



services.

- **Communication Records:** Records of our support chats, emails, and other communications with you.

B. Information We Process on Behalf of Our Partners

This is the data related to **Partner Clients**:

- All the data listed in section 4.A under "Financial Info & Documents" and "Contact Details" that is uploaded by you or your accountant to the portal.

5. Sharing Your Information

We treat all information confidentially.

- **If you are a Direct User or Partner:** We may share your information with our own trusted service providers who help us run our business, such as payment processors, hosting services, and CRM software.
- **If you are a Partner's Client:** The sharing of your data is governed by Your Accountant. We only access it when necessary for support or maintenance and share it only with the sub-processors (like hosting companies) who help us run the Platform.

We use legal agreements to ensure all our providers keep the data safe. Your data mainly stays within the EU/UK. If it's transferred outside, we use approved safety measures.

6. How Long We Keep Your Information

- **If you are a Direct User or Partner:** We keep your information for as long as you are our customer, and afterwards for the period required by law (e.g., for our own tax and administrative records).
- **If you are a Partner's Client:** Your Accountant decides how long to keep your data. We keep it on our Platform as long as they instruct us to.

7. Keeping Your Information Secure

We take security seriously. The security measures listed below apply to **all data** on our Platform, regardless of your user type. These include encryption, strict access controls, and regular security checks.

You can help too by using a strong, unique password and keeping it secret.

Version August 2025



8. Cookies and How You Use the Website

This section applies to **anyone** visiting our Platform. Cookies (small files on your device) help the Platform work properly and help us understand how it's being used. You can manage cookies in your browser settings.

9. Your Rights Over Your Data

Your rights under GDPR are important, but who you contact depends on your relationship with us.

- **If you are a Direct User or a Partner:**
 - Because **PocketCFO is the Data Controller** for your information, please send any requests to exercise your rights (to access, correct, delete your data, etc.) **directly to us at PocketCFO** (hello@pocketcfo.io).
- **If you are a client of one of our Partners:**
 - Because **Your Accountant is the Data Controller** for your information, you must send any requests to exercise your rights **directly to Your Accountant**. They will handle your request and work with us if needed.

10. Making a Complaint

- **Direct Users and Partners:** If you're unhappy with how we handle your data or with our service, please talk to **us at PocketCFO** first.
- **Partner Clients:** If you're unhappy with how your data is handled, please talk to **Your Accountant** first.

If you can't resolve it, anyone has the right to complain to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

11. Updates to This Policy

We might update this policy sometimes. We'll notify our Direct Users and Partners of any significant changes. The latest version will always be available on our site.

Version August 2025