



Privacy Policy

How Fulton Real collects, uses, and protects your personal data

Privacy Policy | Version 2.0 | For use on www.fultonreal.com
Last updated: May 2026

1. Introduction

Fulton Real ('we', 'us', 'our') is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, store, and share personal data when you visit www.fultonreal.com ('the Website'), enquire about our services, or engage with us as an investor or prospective investor.

We operate in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all applicable data protection legislation. We are the data controller for personal data processed in connection with the Website and our services.

Contact for privacy matters

For all data protection enquiries, to exercise your rights, or to raise a concern, contact us at: privacy@fultonreal.com

2. What Data We Collect

We collect and process the following categories of personal data, depending on the nature of your relationship with us:

Category	Data collected
Identity data	Full name, date of birth, nationality, passport or ID details.
Contact data	Email address, telephone number, postal address.
Financial data	Bank account details, investment history, source of funds, net worth declarations.
Transaction data	Details of investments made, capital movements, distributions received.
Technical data	IP address, browser type and version, time zone, operating system — collected automatically when you visit www.fultonreal.com .
Usage data	Information about how you use our website, including pages visited, time spent, and navigation paths.
Communication data	Records of correspondence between you and Fulton Real, including emails and enquiry submissions.
KYC / AML data	Identity verification documentation, politically exposed person (PEP) status, and sanctions screening results, collected as required by law.

3. How We Collect Data

3.1 Directly from you

We collect data when you complete a contact or enquiry form on the Website, subscribe to communications, submit investor qualification documents, correspond with us by email or telephone, or attend meetings or events.

3.2 Automatically from the Website

When you visit www.fultonreal.com, we automatically collect technical and usage data through cookies and similar technologies. This data helps us understand how visitors use the Website so we can improve it. See Section 9 for our full Cookie Policy.

3.3 From third parties

We may receive data from identity verification providers, credit reference agencies, sanctions screening services, and introducers or professional advisors who refer you to us, always in compliance with applicable law.

4. How We Use Your Data

We use personal data only for the purposes for which it was collected, or for compatible purposes. The main purposes are:

- To respond to enquiries and manage our relationship with you.
- To carry out investor qualification, onboarding, and suitability assessments.
- To manage investments, process transactions, and provide investor reporting.
- To comply with legal and regulatory obligations, including AML and KYC requirements.
- To send you updates, reports, and communications relevant to your investment.
- To improve the Website and understand how it is used.
- To detect and prevent fraud, money laundering, and other financial crime.
- To enforce our Terms and Conditions and protect our legal rights.

5. Legal Bases for Processing

We process personal data only where we have a lawful basis to do so. The legal bases we rely on are:

Legal basis	When we rely on it
Contract performance	Processing necessary to enter into or perform a contract with you, or to take steps at your request before entering a contract.
Legal obligation	Processing necessary to comply with applicable law, including anti-money laundering (AML), Know Your Customer (KYC), and financial services regulations.
Legitimate interests	Processing necessary for our legitimate business interests, where those interests

	are not overridden by your rights — for example, improving our website, managing risk, and maintaining business records.
Consent	Where we rely on consent, we will ask for it clearly and separately. You may withdraw consent at any time without affecting the lawfulness of processing before withdrawal.

6. Who We Share Data With

We do not sell, rent, or trade personal data. We share data only in the following circumstances:

- Professional advisors — legal counsel, accountants, tax advisors, and auditors acting for Fulton Real, bound by confidentiality.
- Regulatory and compliance services — identity verification providers, sanctions screening services, and AML compliance platforms.
- IT and data infrastructure providers — secure cloud storage, data room providers, and website hosting, all operating under data processing agreements.
- Regulators and public authorities — where required by law, court order, or regulatory direction.
- Prospective buyers or investors — in the event of a business sale or restructuring, personal data may be transferred subject to equivalent confidentiality obligations.

No third-party marketing

We do not share your personal data with any third party for their own marketing purposes. If this ever changes, we will ask for your explicit consent first.

7. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, or as required by law.

Data type	Retention period	Reason
Investor records and transaction data	7 years after the investment ends	Legal and regulatory obligation
KYC and AML documentation	5 years after the business relationship ends	Anti-money laundering regulations
Correspondence and communications	6 years from the date of communication	Legal claims limitation period
Website usage and technical data	12 months	Website improvement and security
Enquiry and contact form data	12 months	Legitimate interest — follow-up

(not converted)

8. Your Rights

Under UK GDPR, you have the following rights in relation to your personal data. We will respond to all verified requests within one calendar month.

Right	What it means
Right of access	Request a copy of the personal data we hold about you.
Right to rectification	Request correction of inaccurate or incomplete data.
Right to erasure	Request deletion of your data where we no longer have a lawful basis to hold it.
Right to restriction	Request that we limit how we use your data while a dispute is resolved.
Right to portability	Request a copy of your data in a structured, machine-readable format.
Right to object	Object to processing based on legitimate interests or for direct marketing.
Right to withdraw consent	Withdraw any consent previously given at any time.

To exercise any of these rights, contact us at privacy@fultonreal.com. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk if you believe we have not handled your data correctly.

9. Cookies

www.fultonreal.com uses cookies to improve the experience of visitors to the Website. Cookies are small text files placed on your device by your browser.

Cookie type	Purpose	Consent required?
Strictly necessary	Enable core website functions such as page navigation and security.	No — these cannot be disabled.
Functional	Remember your preferences and settings across visits.	Yes — via cookie banner.
Analytics	Understand how visitors use the Website	Yes — via cookie banner.

	(e.g. Google Analytics). Data is anonymised where possible.	
Marketing	Not currently used by Fulton Real.	N/A

You can manage cookie preferences at any time through the cookie settings on the Website, or through your browser settings. Disabling strictly necessary cookies may affect Website functionality.

10. Data Security

We take the security of your personal data seriously and apply appropriate technical and organisational measures to protect it against unauthorised access, loss, or destruction. These include:

- Encrypted data storage and transmission (TLS/SSL).
- Access controls limiting data access to authorised personnel only.
- Secure, access-controlled data rooms for investment documentation.
- Regular review of security controls and third-party data processors.
- Staff training on data protection responsibilities.

In the event of a personal data breach that is likely to affect your rights and freedoms, we will notify you and the ICO in accordance with our legal obligations.

11. International Transfers

Fulton Real operates primarily in the United Kingdom. If any personal data is transferred outside the UK, we ensure it receives equivalent protection through standard contractual clauses approved by the ICO, adequacy decisions, or other lawful transfer mechanisms.

12. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. The current version is always available at www.fultonreal.com/privacy. Material changes will be communicated directly to investors and registered contacts.

This policy was last reviewed and updated in May 2026.