

Last updated on 8/5/2026

## **Privacy Policy**

### **1. Policy Summary**

- 1.1.** At BIGTXN, the privacy and security of personal data are of paramount importance. This Privacy Policy outlines the procedures for collecting, using, disclosing, and protecting personal data in compliance with the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, the EU General Data Protection Regulation and other relevant data protection laws.
- 1.2.** Such personal data is collected through our websites ([www.bigtxn.com](http://www.bigtxn.com), [www.sentinel.fi](http://www.sentinel.fi), and [sanctions.com](http://sanctions.com) and their subdomains), via email, telephone, when networking, or in other forms of contact with us. BIGTXN is committed to ensuring the confidentiality and integrity of all collected data, particularly client data, and upholding the trust of clients and users.

### **2. Commitments by BIGTXN**

BIGTXN commits to:

- 2.1.** process personal information fairly and lawfully, being transparent about how we intend to use your information.
- 2.2.** comply with statutory requirements imposed by the UK General Data Protection Regulation (UK GDPR) and the Data protection Act 2018 and other national laws requiring an adequate data protection standard.
- 2.3.** collect only enough information needed for each specific purpose. Personal information will not be used for any other purpose than as described at the point where you choose to disclose the information.

- 2.4. only process your personal information, that we may use to inform you by telephone, email, mail, or digital advertising if we deem that it is of interest to you in your profession, or if you have expressed your consent. You have the right to opt-out of such communications at any time.
- 2.5. ensure you are never subject to any automatic opt-ins.
- 2.6. apply, use, or take reasonable steps to have security procedures and safeguards that we consider appropriate for the level of personal information you provide us with. We have adopted and implemented systems, security policies, and procedures intended to reduce the risk of unintended destruction or loss, or the unauthorized disclosure of, or access to, your personal information.
- 2.7. transfer your personal information with care. In addition to using your personal information to fulfil requests received from you, we disclose information provided to us when legally required to do so. Additionally, we may share personal information with our affiliates, with unaffiliated third parties that are under contract to perform services for or on behalf of us (who are required to uphold policies with respect to privacy and the treatment of personal information).

### **3. Collection of Personal Data**

- 3.1. BIGTXN may collect two types of information from users:

Personal information—anything which identifies you as an individual, either on its own or by reference to other information.

Aggregate information—other types of anonymous information and data.

- 3.2. Collection methods include:

- Via our website and Sentinel.fi portal - when you interact with these we may collect data through online forms; cookies and similar technologies used to enhance your experience, analyze site usage and support our marketing efforts. You can manage your cookie preferences through our cookie banner or settings.
- Via Email Correspondence - when you email us or respond to our communications we may collect your name, email address, and any contact details you provide. Any personal information contained within the email or attachments, and any metadata (such as time sent, IP address, and device used).

We retain emails for a limited period to respond to your queries or fulfill contractual obligations, unless a longer retention is required by law.

- Via Business cards or In-Person exchanges. If you provide us with your personal information at events, meetings, networking sessions or by handing over business card we may collect your name, job title, company name, phone number, email address and business address, and any additional information you choose to share during the interaction. We process this data to follow up on business inquiries, enter into contracts or maintain professional relationships.

**3.3.** Data collected through these methods is handled in accordance with our lawful bases for processing, which may include consent, contract performance, legal obligation or legitimate interest.

#### **4. Use of Personal Data**

**4.1.** Personal data will only be used for the purposes for which it was collected, or as otherwise permitted by law. We do our best to be transparent about how we intend to use your personal information.

Our processing is mapped to the following legal bases:

- To fulfill contracts: Managing your account, responding to queries, and completing service obligations
- Legitimate Interests: Improving our website, ensuring security, and serving relevant advertising
- Legal Obligation: Preventing illegal activity or satisfying regulatory requirements.

**4.2.** BIGTXN will not use personal data for purposes incompatible with the original collection purposes without obtaining explicit consent, unless required or permitted by law.

## **5. Cookie Policy**

How we use information collected through cookies and other tracking technologies

- 5.1.** A cookie is a small text file that is downloaded to your computer when visiting a website. It allows the website to recognise your computer when you return, enabling the display of your personalised settings and other of your chosen preferences.
- 5.2.** Other tracking technologies (including clear GIFs) are technical mechanisms that allows us to gauge the effectiveness of certain communication activities and the effectiveness of our marketing efforts. You will be given the opportunity to accept or reject the use of cookies on the website in a pop-up box when you first access the website. You will learn what type of cookies BIGTXN places on its websites as well as information as to how to manage your cookies.
- 5.3.** The types of cookie you can expect to see in use on our website are from:
- HubSpot - our marketing automation and CRM system
  - Cloudflare - web performance and security software deployed by

HubSpot

- Google Analytics - statistical analysis of website performance
- LinkedIn - advertising and targeting provider

**5.4.** Specific cookies used include:

**Marketing:** Microsoft Bing Ads (`_uetvid` and `_uetsid`): Blocked until accepted by user: Yes; Marketing cookie. These cookies allow us to engage with a user that has previously visited our website.

**Strictly Necessary:** Cloudflare (`_cfuid`, `_cf_bm`): These cookies manage traffic and mitigate automated "bot" threats.

**5.5.** Data from these cookies may be sent to the United States. We ensure safeguards are in place for these transfers, such as the UK extension to the Data Privacy Framework.

## **6. Data Disclosure**

**6.1.** BIGTXN will not disclose personal data to third parties, except under the following circumstances:

**6.1.1.** *Client Consent:* Personal data may be disclosed to third parties with the explicit consent of the client.

**6.1.2.** *Legal Obligations:* Personal data may be disclosed when required by law, regulatory authorities, or in compliance with legal processes, such as subpoenas or court orders.

**6.1.3.** *Service Providers:* BIGTXN may engage with trusted third-party service providers. Trusted third-party service providers may have access to personal data solely for the purpose of delivering services. These providers are bound by confidentiality obligations and are prohibited from using the data for any other purposes.

Sometimes we use trusted third-party services (like cloud storage, email platforms or analytics tools) that are based outside the UK, including the EU and the US. When we do this, we make sure your data is protected. This includes using approved contracts (like Standard Contractual Clauses) or working with companies in countries that the UK says have adequate data protection laws utilising the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU SCCs. Any access to such information will be limited to the purpose for which such information was provided to us. If you'd like more details about how your data is protected when sent abroad, feel free to contact us.

#### **6.2.** Links and third-party websites:

This Privacy Policy applies only to the websites controlled by BIGTXN. The websites may link to third-party websites where our Privacy Policy no longer applies. We advise you to review each third-party website's privacy policy before disclosing any personally identifiable data.

#### **6.3.** Privacy-focused Analytics and Website Usage Data on Sanctions.com

We use privacy-focused analytics tools to understand how visitors use our websites and to improve performance and content. These tools collect limited, non-identifiable information such as pages visited, device type, and general geographic region. We do not use analytics that track you across websites, create behavioural profiles, or collect personally identifiable information. Analytics data is aggregated and used solely to improve our services.

### **7. Data Security**

**7.1.** BIGTXN employs appropriate technical and organisational measures to protect personal data from unauthorised access, loss, alteration, or

disclosure. Industry-standard security practices are implemented to safeguard personal data and ensure confidentiality, integrity, and availability of the data.

- 7.2.** BIGTXN LTD shall retain data for 7 years for financial records and 2 years for marketing leads, or as long as required to meet regulatory or contractual requirements. Once data is no longer needed, it shall be securely disposed of or archived. The Data Controller, in consultation with legal counsel, may determine retention periods for their data. Personally identifiable information (PII) shall be deleted or de-identified as soon as it no longer has a business use. Customer accounts and data shall be deleted within sixty (60) days of contract termination through manual data deletion processes.

## **8. Client Data Confidentiality**

- 8.1.** BIGTXN recognises the importance of maintaining client data confidentiality. Internal policies and procedures are strictly enforced to ensure that client data is accessed only by authorised personnel to perform their job duties and used solely for the purposes specified by the client. Client data is protected against unauthorised access, disclosure, alteration or destruction using appropriate technical and organizational measures.

Your confidentiality is paramount, and we strive to uphold the highest standards in safeguarding your information.

- 8.2.** Client data is not sold or provided to third parties without explicit client consent, unless required by law.
- 8.3.** Any personal information collected will be processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data protection Act 2018.

## 9. Data Subject Rights

- 9.1. Data subjects have specific rights regarding their personal data, including the right to access, rectify, erase, restrict processing, object to processing, and the right to data portability.
- 9.2. BIGTXN will respond to data subject requests in accordance with applicable data protection laws.
- 9.3. How to opt out or request changes. You are entitled to request that we:
  - provide you with a copy of your personal information that we process in a structured, commonly used, and machine-readable format.
  - cease or restrict processing your personal information as you direct us and for any purpose.
  - correct any errors in your personal information.

If you wish to opt out of receiving marketing related communications from us, send your request to [hello@bigtxn.com](mailto:hello@bigtxn.com) or unsubscribe.

If you would like to receive a copy of the personal information we have about you as submitted to us or if your personal information is incorrect or incomplete, let us know by contacting us at [hello@bigtxn.com](mailto:hello@bigtxn.com) and we will make every reasonable effort to correct or update it promptly (unless we require further information from you in order to fulfil your request). You may also ask us to remove your name and other personal information from our databases. In each of the foregoing cases, we will make all reasonable efforts to meet your request promptly, subject to current legal and legally valid advice and recommendations. If we are unable to fulfil your request, you will be informed of this decision promptly and you will also be informed of the reason behind our decision.

## 10. Changes to the Privacy Policy

- 10.1. BIGTXN reserves the right to update or modify this Privacy Policy as needed to reflect changes in practices or legal obligations.
- 10.2. Any updates will be posted on the BIGTXN website. Clients and users are encouraged to review this policy periodically.

## 11. Contact Information

- 11.1. For any questions, concerns, or requests regarding this Privacy Policy or the handling of personal data, please contact BIGTXN first so we can try to resolve the issue at:

[hello@bigtxn.com](mailto:hello@bigtxn.com)

Registered business address:

BIGTXN Ltd, 1 Royal Exchange, London, England, EC3V 3DG

- 11.2. However, if you are not satisfied with our response or believe we are not handling your data lawfully, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK's independent data protection authority.

You can contact the ICO at:

Website: [www.ico.org.uk](http://www.ico.org.uk)

Phone: 03031231113

## 12. Conclusion

This Privacy Policy reaffirms BIGTXN's commitment to protecting the privacy and security of personal data, particularly client data. BIGTXN adheres to strict confidentiality agreements and employs robust security measures to maintain the confidentiality, integrity, and availability of the data collected.



By using BIGTXN's services, clients and users acknowledge and agree to the practices outlined in this Privacy Policy.