

## Soldo Financial Services Ireland DAC Privacy Policy

At Soldo Financial Services Ireland DAC (hereafter referred to as "**Soldo**"), we will never misuse your data and we will always stick to the letter and spirit of the law. We will never sell it, give it away or use it for anything other than to deliver or improve our services to you.

This privacy policy applies to all individuals who supply personal data to us in relation to our services for businesses. This includes the person who signs up to our services on behalf of our business customer, the super administrators who have authority to create and approve user accounts, and the users who access and use our services in the course of their employment / engagement with our business customer.

This privacy policy sets out how we use your personal data in relation to the supply of our e-money and payment services. There is a separate privacy policy that sets out how we use your personal data in relation to the supply of our technology and software services which is available on our website.

This privacy policy sets out how we use your personal data as data controller. In addition, we use your personal data to supply our e-money and payment services as data processor on behalf of our business customer.

- **Who we are**

We are Soldo Financial Services Ireland DAC of 33 Sir John Rogerson's Quay, Dublin 2, D02 XK09 and we are the data controller of your personal data for the purposes of the EU General Data Protection Regulation.

Our Data Protection Officer is Mario Benuzzi who can be contacted at [privacy@soldo.com](mailto:privacy@soldo.com).

- **The basis for collecting your data**

There are different reasons for collecting your data.

**Legal obligation:** We have to collect and use some of your data to comply with laws to which we are subject. This is called a 'legal obligation'.

**Legitimate interest:** This means we can collect and use your data for legitimate business objectives pursued by Soldo, in a way that most people would think was reasonable. For instance, if you signed up to Soldo and gave us your email address, you might reasonably assume we'd use it to update you about your account activity.

- **Why do we collect and use your data?**

### **On what grounds?**

To allow you to open your business' account and use Soldo's services. In our **legitimate interest** to set up the account so we can provide our services

To make sure our services are safe and secure. **Legal obligation** and in our **legitimate interest** to protect our business and customers

To make sure we are following our legal and regulatory requirements. **Legal obligation**

To carry out background checks and to combat fraud and money laundering. **Legal obligation** and in our **legitimate interest** to prevent fraud and money laundering

To communicate with you about your account with Soldo and about your use of our services. In our **legitimate interests** to communicate with our customers and users

To allow us to bill for our services in accordance with our contract with our business customer. In our **legitimate interest** to bill for our services

For internal operations, including reporting, troubleshooting, data analysis, testing, research, development and statistical purposes. In our **legitimate interest** to ensure the proper operation and improvement of our services and to report on them

- **What data we collect and use**

When you use Soldo's services, or you get in touch with us by email, over the phone, or on social media, we collect some of your personal information.

#### **Basic data**

This includes your name, your address, your email address, your phone number, your job title, the name of your employer, and your username and login information. We also collect information about where you are in the world when you access and use our services, your personal description, and your email avatar (if you have one). We will also hold a copy of the signature used to sign up to our services.

## **Financial Data**

We will hold certain financial information about you. Where you make payments onto your Soldo account, we will hold your credit and debit card details and information about your bank account.

We will hold information about the rules that apply to your Soldo card (such as information about the spending limits and categories of spend permitted that apply to your card).

Where you use your Soldo card to make payments and transactions, we will hold information about the payments and transactions you enter into using the card.

## **Regulatory data**

We carry out identification checks on our customers and users to make sure we comply with our legal and regulatory obligations and to manage the financial risk to our business.

The checks we carry out are Anti-Money Laundering, Politically Exposed Persons and Sanctions Checks. We use third party providers such as Experian and Equifax to carry out these checks for us.

Where we are unable to successfully complete the checks online, we may ask for copies of your identification documents (including your passport and driving licence) so we can complete the checks manually.

The checks we carry out mean we will process information about you to verify your identity and address, including the documentation you provide to verify your identity. We will also check your details against databases to check whether you are on the Politically Exposed Persons or Sanctions lists issued by governments, financial market regulators, and law enforcement bodies from around the world.

We carry out all the checks on the person who signs up to our services on behalf of our business customer and on each super administrator. In addition, we carry out Politically Exposed Persons and Sanctions Checks on each user.

We carry out the checks on the natural persons who have a controlling interest directly or indirectly in our business customer and on the natural persons who exercise executive control over the affairs of our business customer through a senior management position such as a Chief Executive Officer, Chief Financial Officer, Managing or Executive Director or President.

If you're sending a large amount of money, or we need you to make sure we're following anti money laundering regulations, we might need to see proof of your income/source of wealth, or some extra ID. And if you run a business, we might need some extra commercial information - like records that show how your business makes its money.

We might also collect information about the reason you are sending money using our services.

### **Special category data**

We may process some special category data to carry out our identification checks in accordance with our legal obligations.

- **What data we receive**

Soldo works with a variety of other organisations and some of them share your personal data with us. This could be your name and address, and your bank details when you send money.

The organisations that share information with us include the banks and payment service providers that handle yours and your recipient's money, other financial services providers, business partners, sub-contractors in technical, payment and delivery services, credit reference agencies, government agencies, and law enforcement agencies.

- **How we share your information**

We share your data with the banks and certain payment service providers to complete your funds transfers and payments in accordance with your instructions. Without sharing your data, we would not be able to carry out your funds transfers or payments.

We share your data with the third-party providers who carry out our Anti-Money Laundering, Politically Exposed Persons and Sanctions Checks and with credit reference and fraud prevention agencies.

We share your data with our service providers where it is necessary to administer our relationship with you or in order for a third-party service provider to provide their services to us.

We share your data with other entities in the Soldo Group as part of our regular reporting activities on company performance, or in the context of a business reorganisation or group restructuring exercise.

The service providers who receive your data include IT software and services providers, hosting services providers, and administrative services providers.

All the recipients of your personal data are required to take appropriate security measures to protect your personal data. They must only process your personal data for specified permitted purposes and in accordance with data protection law.

We may disclose your personal information to third parties:

- (a) in the event that we sell any business or assets, in which case we may disclose your personal data

to the prospective buyer of such business or assets;

- (b) in order to enforce or apply our terms and conditions which regulate the relationship between you and us and other applicable agreements or to protect the rights, property, or safety of Soldo, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- (c) to assist us in conducting or co-operating in investigations of fraud or other illegal activity where we believe it is reasonable and appropriate to do so;
- (d) to prevent and detect fraud or crime;
- (e) in response to a warrant, court order, or as otherwise required by law;
- (f) to assess financial and insurance risks;
- (g) to recover debt or in relation to your insolvency;
- (h) to develop and manage our customer relationship with your employer; and
- (i) to develop and improve our services and systems.

- **How long we keep your data**

We keep your data for 6 years after the end of the business relationship, unless we are obliged to keep it longer due to legal requirements.

- **What happens if data is not provided**

Where we need personal data to enter into a contract with you or to provide our services or to comply with the law, and you fail to provide the information we request, we may be unable to provide our services to you.

- **How we transfer your data internationally**

So that you can use our services, we sometimes need to transfer your data internationally. This may involve a transfer outside the United Kingdom and European Economic Area to a country which does not have an adequacy decision from the European Commission. Where such transfers occur, we will ensure that: (a) they do not occur without our prior written authority; and (b) we have put in place appropriate safeguards, such as the EU Commission's approved Standard Contractual Clauses to legitimise the transfer. If you would like more information on international data transfers and the safeguards we put in place, please contact our Data Protection Officer.

- **How we protect your data**

All data you provide to us is stored on our secure servers. Any payment transaction will be encrypted using Transport Layer Security technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our services, you are responsible for keeping this password confidential. We ask you not to share this password with anyone else and not to use this password for other services or products. The transmission of data via the internet is not completely secure. We will do our best to protect your personal data but we cannot guarantee the security of your data during transmission, any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorised access.

We restrict access of your personal data to those persons who have a business reason for knowing such information. We continuously educate and train our staff about the importance of confidentiality and privacy of customer data. We maintain physical, electronic and procedural safeguards that comply with the relevant applicable laws and regulations, to protect your personal data from unauthorised access.

- **Your rights**

You can ask to see the information we have about you. You can also ask us to change it, correct it, delete it, restrict how we use it, or object to the way we use it by emailing [privacy@soldo.com](mailto:privacy@soldo.com).

<p><b>Access</b> – You have a right to get access to the personal information we hold about you.</p>	<p>If you would like a copy of the personal information we hold about you, please write to Soldo Financial Services Ireland DAC, 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09, Ireland or <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>.</p>
<p><b>Rectification</b> – You have a right to rectification of inaccurate personal information and to update incomplete personal information.</p>	<p>If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information.</p> <p>Please note that if you request the rectification of your information, we may have to suspend the operation of your account and/or the products and services we provide to you. Please write to or contact us at Soldo Financial Services Ireland DAC, 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09, Ireland or <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>.</p>

<p><b>Erasure</b> – You have a right to request that we delete your personal information.</p>	<p>You may request that we delete your personal information if you believe that:</p> <ul style="list-style-type: none"> <li>• we no longer need to process your information for the purposes for which it was provided; or</li> <li>• we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you request us to delete your information, we may have to suspend the operation of your account and/or the products and services we provide to you. Please write to or contact us at Soldo Financial Services Ireland DAC, 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09, Ireland or <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>.</p>
<p><b>Restriction</b> – You have a right to request us to restrict the processing of your personal information.</p>	<p>You may request us to restrict processing your personal information if you believe that:</p> <ul style="list-style-type: none"> <li>• any of the information that we hold about you is inaccurate;</li> <li>• we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or</li> <li>• we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you. Please write to or contact us at Soldo Financial Services Ireland DAC, 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09, Ireland or <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>.</p>
<p><b>Portability</b> – You have a right to data portability.</p>	<p>Where you have provided us with information for the purposes of entering into a contract with us, you have a right to receive the personal information you provided to us in a portable format.</p> <p>You may also request us to provide it directly to a third party, if technically feasible. We’re not responsible for any such third party’s use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.</p> <p>If you would like to request the personal information you provided to us in a portable format, please write to or contact us at Soldo Financial Services Ireland DAC, 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09, Ireland or <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>.</p>

<p><b>Objection</b> – You have a right to object to the processing of your personal information.</p>	<p>You have a right to object to us processing your personal information based on our legitimate interests unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims.</p> <p>Depending on the circumstances, we may need to restrict or cease processing your personal information altogether or, where requested, delete your information. Please note that if you object to us processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you. Please write to or contact us at Soldo Financial Services Ireland DAC, 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09, Ireland or <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>.</p>
<p><b>Lodge complaints</b> – You have a right to lodge a complaint with the regulator.</p>	<p>If you wish to raise a complaint on how we have handled your personal information, please write to or contact us at Soldo Financial Services Ireland DAC, 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09, Ireland or <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>.</p> <p>We hope that we can address any concerns you may have, but you can always contact the Data Protection Commission. For more information contact:</p> <p>Data Protection Commission  21 Fitzwilliam Square South  Dublin 2  D02 RD28</p> <p><a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a></p>

- **Changes to our privacy policy**

Any changes we make to our privacy policy will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

- **Contact**

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [privacy@soldo.com](mailto:privacy@soldo.com).