

## Soldo Financial Services Ireland DAC and Soldo Ltd. Privacy Policy

At Soldo Financial Services Ireland DAC and Soldo Ltd. (hereafter together referred to as "**Soldo**"), we will never misuse your data, we will 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.

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- **Who we are**

We are Soldo Financial Services Ireland DAC, 33 Sir John Rogerson's Quay, Dublin 2, D02 XK09, Ireland and Soldo Ltd, 119 Marylebone Road, London NW1 5PU. Soldo Financial Services Ireland DAC is data controller of your personal data for the purposes of the EU General Data Protection Regulation. Soldo Ltd is data processor of your personal data the purposes of the EU General Data Protection Regulation.

- **Why we collect your data**

There are several different reasons for collecting your data.

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**Performance of contract:** We have to collect some data in order to provide you a service - your name and bank details, for instance. This is called 'performance of contract'. If we did not collect this data, we would not be able to send your money, or perform any of our obligations under your contract with us.

**Legal obligation:** We have to collect 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. Or, that we'd use it to send you information about our products and services that could help you get the most out of Soldo. You can opt out of receiving emails like this whenever you want by clicking the 'unsubscribe' link. You will find it at the bottom of every email.

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

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### On what grounds?

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So you can open an account and use Soldo services. **Performance of contract**

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To make sure our services are safe and secure. **Legal obligation**

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To make sure we are following our legal and regulatory requirements. To do this, we might have to share your information. **Legal obligation**

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To combat fraud or money laundering. Again, we might have to share your information to make sure we are doing this. **Legal obligation**

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To manage, analyse and improve our services and to ensure they are presented in the most effective manner. **Legitimate interest**

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To personalise your account to suit you - for instance, making sure you see the website in the right language. We use your IP address to do this, not location data. **Legitimate interest**

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If you agree, to remember your account preferences for next time - your login details or password, for instance. **Legitimate interest**

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To keep you updated about your account activity - like your money transfers or spending with your card. **Legitimate interest**

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To administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. **Legitimate Interest**

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If you're a customer, to send you relevant information about our products and services. We won't send you this if you unsubscribe. **Legitimate interest**

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To measure or understand the effectiveness of advertising we serve. **Legitimate Interest**

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To carry out our obligations relating to your contract(s) with us to provide you with the information, products and services that you request from us. **Performance of Contract**

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- **What data we collect**

When you use Soldo, 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 things like your name, your address, your email address, and your phone number. It might also include financial information - like your credit or debit card details, or information about your bank account. We might also collect the reason you are sending money, where you are in the world, your personal description, your email avatar (if you have one), and photographs from the ID you use to verify your identity.

**Regulatory data**

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.

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**Technical data**

We might collect information about the kind of device you're using - like whether it is a phone, a laptop, or a tablet, and where in the world you are using it. We might also collect some of the more techy things, like your IP address, your login information, the type and version of your internet browser, the timezone setting, the kind of browser plugs-ins you have, the type of operating system you use, and whether you are logging in from the web, or from the Soldo app.

- **What data we receive**

Soldo works with a variety of other companies and websites. Some of them share your basic information with us. This could be your name and address, your bank details when you send money.

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The companies that share information with us could be the banks and payment service providers that handle yours and your recipient's money, other financial services, business partners, sub-contractors in technical, payment and delivery services, advertising networks, social media sites, online search engines, analytics services, credit reference agencies, government agencies, law enforcement and credit reference agencies.

- **How we share your information**

Some of our partners need your data to complete your funds transfers, hence we share it with them.

Without sharing your data we would not be able to carry out your funds transfers.

We may share your information with selected third parties including:

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- (a) affiliates, business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - (b) analytics and search engine providers that assist us in the improvement and optimisation of our site.
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We may disclose your personal information to third parties:

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- (a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
  - (b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or 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;
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- (d) to prevent and detect fraud or crime;
  - (e) in response to a subpoena, 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; and
  - (h) to develop customer relationships, services and systems.

- **How long we keep your data**

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

- **Automated decisions**

Sometimes, decisions about your data are made by computers. For example, when you submit your application to Soldo, a computer undertakes the task of establishing your identity to the required standard, not a person. This is called an 'automated decision'. You can ask us not to make automated decisions about your data by emailing [privacyEU@soldo.com](mailto:privacyEU@soldo.com).

- **How we transfer your data internationally**

So that you can use Soldo, we sometimes need to transfer your data outside of the European Economic Area. For example, if we receive a request for information from a United States law enforcement agency we may be obliged to provide your data. 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 Standard Contractual Clauses to legitimise the transfer. The United States is a country which according to the European Commission, does not provide an adequate level of protection to Personal Data. Transfers to the United States will be carried out in accordance with United States Privacy Shield certification.

- **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 employees of Soldo who have a business reason for knowing such information. We continuously educate and train our employees 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, including the EU General Data Protection Regulation and the Data Protection Acts 1988 to 2018, to protect your personal data from unauthorised access.

- **Cookies**

Our Services use cookies to distinguish you from other users. This helps us to provide you with a good experience and also allows us to improve our Services. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

• **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 [privacyEU@soldo.com](mailto:privacyEU@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 Soldo Ltd, 119 Marylebone Road, London NW1 5PU or email <a href="mailto:privacyEU@soldo.com">privacyEU@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. 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 Soldo Ltd, 119 Marylebone Road, London NW1 5PU or email <a href="mailto:privacyEU@soldo.com">privacyEU@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 Soldo Ltd, 119 Marylebone Road, London NW1 5PU or email <a href="mailto:privacyEU@soldo.com">privacyEU@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</p>
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	<p>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 Soldo Ltd, 119 Marylebone Road, London NW1 5PU or email <a href="mailto:privacyEU@soldo.com">privacyEU@soldo.com</a>.</p>
<p><b>Portability</b> – You have a right to data portability.</p>	<p>Where we have requested your consent to process your personal information or 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. 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. 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 Soldo Ltd, 119 Marylebone Road, London NW1 5PU or email <a href="mailto:privacyEU@soldo.com">privacyEU@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 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 Soldo Ltd, 119 Marylebone Road, London NW1 5PU or email <a href="mailto:privacyEU@soldo.com">privacyEU@soldo.com</a>.</p>
<p><b>Marketing</b> – You have a right to object to direct marketing.</p>	<p>You have a right to object at any time to processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing. Please use the unsubscribe button which is on all marketing emails.</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 Soldo Ltd, 119 Marylebone Road, London NW1 5PU or email <a href="mailto:privacyEU@soldo.com">privacyEU@soldo.com</a>. We hope that we can address any concerns you may have, but you can always contact the Data Protection Commission. For more information, visit <a href="https://www.dataprotection.ie/en/contact/howcontact-us">https://www.dataprotection.ie/en/contact/howcontact-us</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 notice.

- **Contact**

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