

## Soldo Software Ltd.

### Privacy Policy

At Soldo Software Ltd. (hereafter referred to as "**Soldo**", "**we**", "**us**" or "**our**"), 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 technology and software services for businesses. This includes the person who signs up to our services on behalf of our business customer, users who are given authority to create and approve user accounts on behalf of our business customer (known as 'super administrators'), and users who access and use our services in the course of their employment/engagement with our business customer.

Soldo Software Ltd is a provider of technology and software solutions and therefore this privacy policy describes how we use your personal data in relation to the supply of our technology and software services. Depending on the address you signed up with, one of our related companies will be responsible for providing e-money and payment services to you - if you signed up with a UK address you can read Soldo Financial Services Ltd's privacy policy [here](#) and if you signed up with a European Union address you can read Soldo Financial Services Ireland DAC's privacy policy [here](#). The relevant privacy policy describes how your personal data is used in relation to the supply of e-money and payment services to you.

- **Our role**

In respect of your personal data that we process if you sign up to our services on behalf of our business customer, if you act as a super administrator, if we ask for information from you directly, if you submit information to us directly, or if we market to you, we are the data controller of that personal data for the purposes of the EU and UK General Data Protection Regulations.

In addition, when we provide access and use of our technology and software services to our business customers, we provide those services through a separate set of terms and conditions with our business customers. In those cases our business customer is the data controller and we are the data processor.

- **Who we are**

We are Soldo Software Ltd of 119 Marylebone Road, London NW1 5PU

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

- **The basis for collecting your data**

There are different and overlapping reasons we rely on for collecting your data, including:

**Fulfillment of contract:** This means we need to process certain personal data so that we can provide our services and comply with our specific obligations under the contract for example, billing or provision of software.

**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 when balanced against your right to privacy.

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

**On what grounds?**

- So you can open your business' account and use Soldo's services. For **fulfillment of contract** and in our **legitimate interest** to set up the account so we can provide our services
- To make sure our services are safe and secure. In our **legitimate interest** to protect our business and customers
- To manage, analyse and improve our services and to ensure they are presented in the most effective manner. In our **legitimate interest** to improve our business and services
- To personalise your account to suit you - for instance, making sure you see the website and mobile application in the right language. We use your IP address to do this, not location data. In our **legitimate interest** to ensure information is presented in the best way
- If you agree, to remember your account preferences for next time - your login details or password, for instance. In our **legitimate interest** to ensure ease of use of our website, mobile application and services
- To communicate with you about your account with Soldo and your use of our services. In our **legitimate interest** to communicate with our customers and users
- To allow us to bill for our services in accordance with our contract with our business customer. For **fulfillment of contract** and in our **legitimate interest** to bill for our services
- For internal operations, including reporting, troubleshooting, data analysis, testing, research, development, statistical and survey purposes. In our **legitimate interest** to ensure the proper operation and improvement of our website, mobile application and services and to report on them

- To send emails and communications about products and services we offer that are similar to those you have already used or other products and services we think may help you get the most out of Soldo, unless you have objected to such use. You will always have the right to ask us to stop sending you such information whenever you want by clicking the 'unsubscribe' link at the bottom of each email. In our **legitimate interests** to market our products and services, understand your needs, and manage and improve our business.
- To measure or understand the effectiveness of advertising we serve. In our **legitimate interest** to ensure we promote our business efficiently and effectively
- **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 as described below.

We will hold details of the bank accounts used to fund your Soldo account and details of the account where funds are sent following redemption requests.

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 or transactions, we will hold information about the payments and transactions you enter into using the card.

#### **Technical data**

We 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 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, whether you are logging in from the web, or from the Soldo app, and how you interact with and use our services.

- **What data we receive**

Soldo works with a variety of other organisations and some of them share your personal data with us.

The organisations that share information with us include business partners, sub-contractors in technical and delivery services, advertising networks, social media sites, online search engines, and analytics services.

- **How we share your information**

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, administrative services providers and analytics and search engine providers that assist us in the improvement and optimization of our website and mobile application.

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 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.
- (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 business' 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. Where you are based in the United Kingdom or the European Economic Area, this may involve a transfer outside the UK or EEA 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. We use strong customer authentication (SCA) for extra security when logging in to our technology and software services. 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.

- **Cookies**

Our services use cookies to distinguish you from other users. This helps us to provide you with a personal 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 [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 email <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. 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 email <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 email <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</p>

	<p>processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you. Please email <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 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.</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 email <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 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 email <a href="mailto:privacy@soldo.com">privacy@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 email <a href="mailto:privacy@soldo.com">privacy@soldo.com</a>. We hope that we can address any concerns you may have, but you may always contact your local data protection regulator.</p> <p>For more information in the UK contact: Information Commissioner's Office Wycliffe House</p>

	Water Lane Wilmslow Cheshire SK9 5AF Tel: 0303 123 1113 <a href="https://ico.org.uk/">https://ico.org.uk/</a>
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- **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).