



## **YOLT PRIVACY POLICY v7.1**

**This privacy policy governs the processing of your personal data by Yolt as part of the Yolt App. The Yolt App will be delivered by Yolt Limited, and the payment services provided under the Yolt App will be delivered by Yolt Technology Services Limited.**

**Any reference in this policy to "we", "us", "our" or "Yolt" means both Yolt Limited (Yolt Limited) and Yolt Technology Services Limited (YTS).**

**The processing of your personal data as part of the Yolt Card and Yolt top-up account by PrePay Technologies Limited (PPS) is governed by their privacy policy, which can be found in the "PPS Privacy Policy" section below or on [www.yolt.com/privacy](http://www.yolt.com/privacy).**

Welcome to Yolt! We're happy to have you on board and hope you enjoy unthinking money with us.

Here is our privacy policy, so you can fully understand just how Yolt handles your data. Security is our number one priority. We have bank level security measures which mean your information is guarded and protected. More details on how the Yolt App works, and details on how you may use the Yolt App, is set out in our App Terms.

### **A SUMMARY OF THE YOLT DATA PROTECTION PRINCIPLES:**

#### **Privacy and security is in our DNA:**

- We strongly protect and secure the personal data we hold about you.
- We will only use your personal data for your benefit and to deliver you our services.
- We do not sell your data to third parties.
- Where we track your use of the App, we do this to continuously improve and personalise your experience.
- Where we reuse your personal data, we do so to avoid asking you for the same data twice.
- We may use suppliers to help us deliver our service, but we restrict their use of data to what you allow us to do and bind them to UK or European Union data protection rules and to strict confidentiality.
- Where you enable partners on the Yolt platform, they may receive relevant data about you, but only:
  - With your explicit consent
  - When it is clear to you what you sent
  - For what purpose these partners will use that data

#### **You are in control:**

- You decide what banks to connect to the App or not.
- You can disconnect a bank at any time to stop data exchange.
- You have the right to be forgotten: You can delete your Yolt account through the App. We will then delete all data we have about you.
- You decide what partners to connect and disconnect. If you disconnect a partner any data exchange will stop.
- Any data that a partner has received based on your consent, will still be that partner. You should request deletion of that data and your right to be forgotten directly with them. We will help you where we can.
- If you don't want us to personalise your App experience or use your data to improve our App or website, you can always disable this through the Cookie Settings on the website and in the future via the Privacy settings in the App.

#### **Our community:**

- We want to create a relevant experience for you, so the data we collect might be used by Yolt Limited anonymously in communications such as:
  - Blog posts and infographics
  - Emails such as weekly or monthly Yolt insights
  - Social media posts
  - Campaigns

Our public insights, posts and infographics are always anonymised and aggregated and can never be tracked down to you personally.

**Europe:**

- Your data is stored in the European Union or in the UK
- Your data is always protected by UK or European Union rules

**1. WHAT PERSONAL DATA DO WE USE?**

**What is personal data?**

Personal data is any data relating to a person who is identified or who can be identified (such as a name, an identification number, or an online identifier)

**Personal data you give us:** You may give us personal data about you by filling in forms on, or interacting with, the App, our website, or by corresponding with us by phone, email or otherwise. Examples of personal data collected include:

<b>Yolt Limited</b>	<ul style="list-style-type: none"> <li>• Content you share with us in our community (Facebook, Twitter etc) or via our social media channels or via our Customer Care.</li> <li>• Information that you input to configure how the Yolt App works for you (e.g. your budgets)</li> <li>• Personal data about your financial circumstances (e.g. filling out a form to benefit from one of our comparison providers).</li> <li>• Information that you permit YTS to share with Yolt Limited.</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Phone number</li> <li>• Copies of personal identification documents (such as your Passport, ID, Driving Licence).</li> <li>• Personal information required to identify you and verify the information you give us, including photos/selfies and your video recordings of taking such photos/selfies</li> <li>• Biometric data (such as fingerprint or facial recognition data) to grant access to our App on your device.</li> </ul>
<b>YTS</b>	<ul style="list-style-type: none"> <li>• Information we need to connect to your providers and retrieve your transactional information (account information services)</li> <li>• Information we need to initiate the transfer of money on your behalf and send an instruction to your connected provider(s) (payment initiation services).</li> </ul>	

**Personal data from connected banks:** If you connect one of your banks to the App or use payment initiation services, YTS will collect data from your connected banks and display that data to you, such as:

- bank account details, account numbers, information about your transactions;
- information identifying the account you have with your connected bank;
- information to initiate and process the transfer of money on your behalf;
- transactions made on those accounts;
- your direct debits and standing orders;
- as part of your account information, YTS may collect sensitive personal data (*for example*, if you have a payment for a membership to a particular political party, this could reveal your political beliefs).

YTS will not profile you on the basis of this data and YTS will not use this data for any purposes other than providing YTS services as detailed hereunder.

You authorise YTS to share this data with Yolt Limited. Yolt Limited will then use that data to provide Yolt App functions to you, such as analysis of your spend. Further information on the services Yolt will provide to you can be found in the Yolt App terms.

**Personal data we collect from you:**

**Yolt Limited**

When you use the App or Yolt website, *Yolt Limited* may – itself or through its partners - collect information such as:

- IP address;
- device details;
- your login information;
- information about each visit you make to the App (such as page response times and length of visit);
- location data;
- info about your use of the App or website through tracking tools;
- information from your phone (like contact details from your address book) if you give Yolt Limited consent to use that data.

*Yolt Limited* use well-known advertising platforms such as Facebook and Google to tell you about the App:

- If you click through such an advert and agree to the App Terms, an automated process will confirm to the advertising platform that you have signed up to the App and how much you use the App.
- If you don't use these platforms Yolt Limited will not collect or process this data.

*Yolt Limited* will use tools to improve the user experience of the Yolt website and to personalise your App experience. Therefore, Yolt Limited performs statistical analyses about the way you use the services of Yolt (such as information on how you navigate, how much time you spend, how long you visit, and from where you came to our service:

- For the Yolt website: Yolt uses Google Analytics on the Yolt website. Google Analytics is not used on your transaction data and Google will not see this:
  - Yolt has a data processing agreement in place with Google;
  - Yolt masks part of your IP address so you are not traceable;
  - Yolt does not share your data with Google and does not use this in other Google services
- For the App: Yolt uses Webbtrek, Google Firebase and other tooling to personalise your App and improve our services.

If you don't want this, you can always disable this through the Cookie Settings on the website or via the Privacy settings in the App.

### **Yolt Limited and YTS**

We may also collect information such as:

- information we require to comply with our legal and regulatory obligations (such as "Know-Your-Customer" and "Customer Due Diligence");
- information to verify the data you give us.

We collect data from you about the **Yolt Card and the Yolt E-Money Account** through our partner PrePay Technologies Limited (PPS):

- account details, account numbers, information about your transactions;
- transactions made on the Yolt E-Money Account and with the Yolt Card;
- data on how and where you use your Yolt Card and Yolt E-Money Account;
- information required to comply with legal and regulatory obligations and to prevent fraud.

## **2. WHAT DO WE USE YOUR PERSONAL DATA FOR?**

**Contractual performance:** If you download our App and want us to deliver you our services, we can only perform these services if we can process your personal data for this purpose. So we process your personal data on this basis for the following purposes:

- *For YTS:* To Retrieve and display your Account transaction data, and to initiate payments on your behalf.
- *For Yolt Limited:* To do the following:
  - Provide information on your Accounts, such as Smart Money Insights, Alerts and budget information and an account overview.
  - Enable you to purchase and use services and products of our partners in the Partner Platform

**Your consent:** We will rely on your consent to process and use your personal data for the following purposes:

- *For Yolt Limited:* To do the following:
  - If you wish to share the copy of the ID document we hold for you for other purposes (e.g. because a Partner would need it to enrol you in its products or services) you choose to do so upon your further specific consent at that point in time.

**Legitimate interest:** *Yolt Limited* uses your personal data on the basis of its legitimate interest and to your benefit so that it can:

- Create a persona about you, so:
  - *Yolt Limited* can give you relevant Smart Insights and suggest relevant Actions for you;
  - *Yolt Limited* can deliver you the benefit of our App and connect you to our services and the services and products of *Yolt Partners*.
- To train data models and data science services.
- Provide you with updates about *Yolt* and the App.
- Improve your experience of the *Yolt* service:
  - assess the use of the App;
  - help *Yolt Limited* identify people like you that might enjoy the App.
- Make a secure connection between your device and the App.
- Contacting you in relation to the security of the App or vital information on the *Yolt* services, such as contacting you via your phone number if it is suspected that the integrity of your account has been jeopardized or if you need to act urgently.
- Track and examine the use of the App and the website to prepare reports on its activities and analyse that data.
- Attract new partners and get you the best deals available.
- Perform research and trend analysis to optimise your experience;
  - creating content using some personal data will enable *YTS* to engage with you in a relevant and human way;
  - using and presenting content based on data provides an ideal way to talk to you about the benefits of *Yolt* and its features in an engaging and relatable way and link you back to the benefit of the product.
- Engage and activate users by:
  - learning from beta services;
  - re-engaging users via social media, mobile phone and across the web;
  - re-engaging users via email (you can stop *Yolt Limited* doing so any time by using the unsubscribe link at the bottom of the emails you receive);
  - providing more detailed information on your spending data, e.g. a weekly or monthly email on personalised insights;
  - organizing competitions, contests and prize draws.
- Optimize your experience in the Partner Platform, the Rewards Program and our Deals sections by:
  - suggesting 3rd party products and services that might interest you;
  - based on your interests and our Smart Insights offering you deals or promotions tailor specific Deals or Rewards for you;
  - reusing and pre-filling data which you have already provided to *Yolt Limited* when you connect a new partner or new product or service in the Partner Platform or claim a Deal or Reward. *Yolt Limited* does so to avoid asking you for the same data twice and you can always validate and update this data.
- *Yolt Limited* may use your personal data in an anonymised and aggregated form to enrich content in:
  - Blog posts and infographics;
  - Emails, such as a weekly or monthly *Yolt* insight;
  - Social media posts;
  - Campaigns.This will never contain data or insights or information that can be linked to you personally.
- For both *YTS* and *Yolt Limited*: (Re)Using personal information we have collected to identify you and to verify your identity to validate the data we hold about you and enrich your data. This excludes ID copies.

*Yolt Limited* will always use the minimum data required and will process to the minimum extent required.

*Yolt Limited* and *YTS* may each also use the data to take action to defend its rights under the App Terms if you misbehave or act in deviation of laws or regulations or the App Terms.

**Legal obligations:** *Yolt Limited and YTS* will each also process your personal data where we are under a legal obligation to do so to:

- Identify you and verify your identity to comply with our Customer Due Diligence and Know-Your-Customer obligations;
- Prevent and detect fraud, money laundering, other crime, and security issues, and to reduce Yolt's and YTS' analogous risks;
- Comply with laws and regulations, as well as any sector-specific guidelines and regulations.

**Please be aware that if you do not want us to process the data for the purposes set out above or you restrict our use under section 3 below, that we cannot deliver our services to you. The Yolt experience is about being smart and getting smart with data. Without the use of your data there is no Yolt experience.**

### **3. YOUR KEY RIGHTS**

Your primary right is the **right to stop processing your data** (right to object):

- The App is designed to put you in control and enables you to withdraw your consent by:
  - Deleting your account or deleting a connected bank.
  - Disabling a connection with an activated partner.
  - Disabling tracking your use of the App in the Privacy Settings of the App.
  - If any of the above deleting/ disabling features have not worked or if you cannot connect to the App, sending us an email with the request to be forgotten.
- You have the right to ask us not to process your personal data for marketing purposes:
  - You can always unsubscribe to our emails and campaigns
- You have the right to object to us processing information about you where we do so on the basis of a legitimate interest. If we cannot make that work, it could mean that we may not be able to provide you with the App at all.

This would not invalidate any processing of the personal data prior to your withdrawal of consent.

Your **other rights** are:

**Right of access and data portability:** All data that you have provided us is accessible in the App.

You can request a copy of all personal data you have provided us through the App or via the email-address you have provided us at registration.

If technically possible, we will help you to automatically export this data to other platforms or users.

We can only give you the data we hold ourselves. Any data that a partner holds about you is with that partner. You should request access to or deletion of that data and/ or your right to be forgotten directly with them. We will help you where we can.

**Right to rectification:** You can control your data through the App. Where you cannot change this data through the App, you have the right to ask us to rectify inaccurate or incomplete personal data which we have about you.

**Right to restrict:** You have the right to restrict the processing of your personal data where:

- you contest the accuracy of the personal data we hold about you, for a period enabling us to verify the accuracy of the personal data;
- the processing of your personal data is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- you have objected to processing of your personal data pending the verification whether our legitimate grounds for processing override your privacy rights.

Where Yolt does no longer need your personal data for the purposes of the processing, but we are required to keep it for the establishment, exercise or defence of legal claims, we automatically restrict the processing of your personal data to this purpose.

**Right to erasure:** You have the right to ask us to erase your personal data:

- You can delete your Yolt account through the App. This will automatically delete all information we have about you.
- Be aware that the partners you have activated may still have data about you. You will need to contact them directly in order to request that they delete this data.

**Right to object to automatic processing:** You don't need to object because we don't subject you to decisions based solely on automated processing which significantly affect you or for direct marketing purposes.

#### 4. WHERE DO WE STORE YOUR PERSONAL DATA?

**Your data is stored in Europe:** The personal data we collect from you is stored by us on secure information technology systems located in the UK or the European Economic Area (for example: The Netherlands, Germany, United Kingdom, and Ireland).

**For the provision of support services or as necessary to troubleshoot the App,** we may give access to our systems to suppliers outside of the European Economic Area:

- This will only be incidental access.
- If we give access, we will only do so under UK or European Union data protection rules, and our suppliers are bound to abide by this.

Partners are bound by the same European Union data protection rules as we are, but **PPS, your Partners or Deal providers could decide to store your data in other countries or parts of the world where we do not store your personal data.** That is not in our control. We recommend you to carefully read their privacy policies to understand where your personal data may be transferred.

#### 5. PROTECTING YOUR PERSONAL DATA

**Security is in our DNA:**

- We are committed to ensuring that your personal data (including your Account Information and financial details (described in the App Terms) is secure.
- In order to prevent unauthorised access to or disclosure of it, we have put in place suitable physical, electronic and operational procedures to safeguard and secure the personal data we collect about you.
- In particular, we protect your personal data by deploying SSL and high standard encryption algorithms.
- We also ensure that we meet security standards imposed by law that are applicable to the operation of Yolt.
- We will never ask your PIN or other security credentials.

**Help us protect you:**

- To help us protect your personal data, you agree to comply with our security policies and procedures that we notify to you from time to time.
- You also agree to take all reasonable steps to prevent the unauthorised or fraudulent use of your User Login or PIN code, or other security credentials.
- If you find out or suspect that your App's User Login, PIN code, or recovery code has been lost, stolen, or someone has used it without your permission, you must tell us as soon as possible.

#### 6. PARTNER PLATFORM, YOLT DEALS AND REWARDS

We may use your personal data to enable you to use or purchase the products or services of our partners in the Partner Platform if you want to connect with one of our partners or to deliver you our Deals and Rewards.

**You are in control:**

- We only share your personal data if you consent to connect a partner or decide to accept a Deal or cash a Reward.
- Only after such consent will we disclose or prefill your personal data to those third parties so that they can provide their services to you and give you a smooth user experience.
- We won't disclose more than is needed for the products and services of that partner.

**Always read the Partner's and Deal provider's terms and conditions and their privacy policy:**

- The use of your data by the partners, Deal providers and program partners will be governed by their terms and conditions and their privacy policy – we do not control this.

**De-activate a partner:** You can always de-activate a partner:

- This will stop any data-exchange, but be aware that a partner could retain certain personal data about you that has been exchanged before.
- If you want a partner to delete your data then you should contact this partner directly.

**Partner products and services** could be:

1. International payments
2. Consumer credit
3. Insurance products
4. Pension products
5. Investment products
6. Current accounts (including debit cards)
7. Prepaid cards
8. Savings
9. Utilities
10. Leisure
11. Phone & Broadband
12. Loyalty cards and loyalty schemes

**Yolt Deals** could be:

1. Cashback or rewards, from the partner or Yolt or both
2. Discounts
3. Vouchers

All deals are exclusive to Yolt App users that may or may not have engaged with the Partner before.

## 7. PROVIDERS, REGULATORS AND LAW ENFORCEMENT

Other than what is described above, we will only share your personal data in a very limited way.

This will happen either where we need to use services we cannot build ourselves or have a duty or legal obligations to disclose it:

- **Our service providers** (including their sub-contractors). This may happen where they help us to run our service or the technology systems that are needed to operate our App and services. This includes:
  1. Various cloud and technology providers to offer our service (for example, hosting services and data management services), They will only have access to your data with our consent. We only use instances and servers located in the UK or the European Economic Area.
  2. Identification and verification service providers, to help us adhere to our legal obligations to verify your identity and the information you give us. These may include:
    - a. SafeNed-Fourthline Limited (United Kingdom)
    - b. SafeNed-Fourthline B.V. (the Netherlands)
  4. Social Media Platforms via campaign-IDs so that we can provide relevant content to you on Social Media.
  5. Email services e.g. to send you regular updates or communication.
  6. Customer relation management to provide you with customer care services.
  7. Fulfilment-partners to help us find deals for you, or to help us to deliver on our services, deals, rewards, contests or prizes.
  8. Services providers to help run the Yolt Card and Yolt E-Money Account such as Payvision B.V. to facilitate you in topping-up your Yolt Card and Yolt E-Money Account.
  8. Website and app analytics to provide you with the best experience.
- **Yolt Group:** we may transfer your personal data to the companies under control of Yolt Group B.V. (the "**Yolt Group**") and – as part of the ING Group – with ING Bank N.V. We may have the entities within the Yolt Group and ING Bank N.V process your personal data. Use of your personal data within the Yolt Group:
  - will always be bound by and limited by the provisions of this Privacy Policy;
  - does not limit or take away the liability and accountability of us towards you for the processing of this data within the Yolt Group
- **PrePay Technologies Limited (PPS):** as the issuer and provider of the Yolt Card and Yolt E-Money Account
  - *Yolt Limited* will share your personal data with PPS:
    - to make the Yolt Card and Yolt E-Money Account available in the Yolt App;
    - to enable PPS to optimally service you and deliver the Yolt Card and Yolt E-Money;
    - to support PPS in complying with their legal and regulatory obligations (such as "Know-Your-Customer" and "Customer Due Diligence") and prevent fraud.
  - PPS will share personal data they hold about you with *Yolt Limited*:
    - To give you the best experience of the Yolt Card an Yolt E-Money Account in the Yolt App.
    - to support us in complying with our legal and regulatory obligations (such as "Know-Your-Customer" and "Customer Due Diligence") and prevent fraud.

The use of your personal data by PPS is governed by the PPS Privacy Policy that you have accepted as part of installing the Yolt App and activating your Yolt Card and Yolt E-Money Account. The PPS Privacy Policy can also be found at [www.yolt.com/privacy](http://www.yolt.com/privacy)
- **Regulators** in connection with their duties, such as crime prevention or carrying out regulatory oversight of what we do.
- **Fraud prevention agencies (such as CIFAS) and law enforcement agencies**, to prevent and detect fraud, money laundering or other crimes and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by <https://www.cifas.org.uk/fpn>

## 8. HOW LONG DO WE KEEP YOUR DATA

We are only allowed to keep your personal data for as long as it's still necessary for the purpose we initially required it.

If you delete your Yolt account or invoke your right to be forgotten, we will use feasible solutions to make it no longer directly available in our systems, like archiving it. This means that in such case:

- Yolt will no longer actively process your data as part the YTS Services;
- It will continue to be available for processing under a legal or regulatory obligation.

If you are rejected for our services, we automatically delete your data (including the data you have provided us with as part of onboarding) from our production systems 60 days after the rejection if no action is taken by you.

As we are in financial services and bound by strict regulations, this means that we need to retain the data we hold about you for a minimum of **7 years after termination of your Yolt account**. If (local) regulations require us to retain it longer or delete it sooner, we will follow these retention periods.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

## 9. CHANGE OF OPERATOR

We may access and disclose your personal data when we sell, merge, or change the operator of Yolt or any connected products such as Yolt Card, or in preparation for any of these events. If this happens then the buyer, merged entity or new operator will be able to continue to use your personal data, but only in the manner set out in this privacy policy unless you agree otherwise.

## 10. USING COMPUTERS TO MAKE DECISIONS ABOUT YOU

The App produces smart insights to empower you with your money, from smarter spending to better budgeting. We store information about you into our systems in order to make decisions on what products and services to recommend to you.

**We do not use automatic processing or profiling to make automated decisions about you that could significantly impact you (like refusing you financial products or credit profiling).**

## 11. OUR CONTACT DETAILS

- Yolt Limited (company number 12388821) and Yolt Technology Services Limited (company number 12388678) each have their registered office address at 8-10 Moorgate, London, United Kingdom, EC2R 6DA.
- You can exercise any of the rights under this privacy policy or contact us at:

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

- You can contact our Data Protection Officer at:

[DPO@yolt.com](mailto:DPO@yolt.com)

## COMPLAINTS TO THE PRIVACY REGULATOR

You have the right to complain to the privacy regulator in the country in which you reside, where you work, or anywhere where you believe we might have broken data protection rules.

In the UK, the privacy regulator is the Information Commissioner's Office (the "ICO"). The ICO can be contacted at:

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- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Telephone: 0303 123 1113 (local rate) or 01625 545 745
- Email: <https://ico.org.uk/global/contact-us/email/>

## Version: 7.1

Published 1<sup>st</sup> February 2020, effective 15<sup>th</sup> February 2020

The updates in this version have been made to:

- Include the fair processing notice of CIFAS on sharing data with fraud prevention agencies.
- Alignment of the Privacy Policy with the EDPB Guidelines 06/2020 on the interplay of the Second Payment Services Directive and the GDPR.
- Smaller copy changes and corrections with no material impact.



## **PPS PRIVACY POLICY** **YOLT CARD AND E-MONEY ACCOUNT**

### **Important information you need to know about this Privacy Policy**

This is the Privacy Policy between us, PrePay Technologies Limited and you in relation to the personal information processed in relation to the Yolt Card and the Yolt E-Money Account. These are additional and separate to the Privacy Policy that applies in relation to the processing of your personal information in the Yolt App, which can be found above in the Yolt Privacy Policy section or at [www.yolt.com/privacy](http://www.yolt.com/privacy).

Please read this Privacy Policy carefully before you activate your Card or use any of our services. By confirming that you accept the terms of this Privacy Policy, or by activating your Card and/or using our services, you accept this Privacy Policy. If there is anything you do not understand, please contact us at [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com).

### **Who is Prepay Technologies Ltd**

Prepay Technologies Ltd, trading as PrePay Solutions, ("PPS", "Our" and "We") is a company registered in England and Wales with number 04008083 and a registered office at 6th Floor, 3 Sheldon Square, Paddington, London, W2 6HY, United Kingdom. You can email PPS at [contact@prepaysolutions.com](mailto:contact@prepaysolutions.com) or you can call PPS on 0845 303 5303 (+44 845 303 5303 from outside the UK).

### **E-Money Cards and Accounts**

This Privacy Policy is only applicable to Cards and/or Accounts ("Card") issued by PPS. PPS is the Data Controller in relation to your Card and all necessary activities relating to the operation of the Card: allowing you to receive, activate and use your Card (activating, managing and using your online account where applicable, making and receiving payment transactions, meeting legal requirements, answering requests, providing information to you). You may be the Customer or you may be a person that has been provided with a Card by the Customer.

### **Yolt**

If you provide any personal information to Yolt relevant to your Card (this party is clearly identifiable by the branding on your card), the Programme Manager is a separate Data Controller and you can view their Privacy Policy on [www.yolt.com/privacy](http://www.yolt.com/privacy). If you are not sure please do ask for clarification by contacting [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com).

### **Contact details for the PPS Data Protection Officer**

Our Data Protection Officer can be contacted at PO Box 3883, Swindon SN3 9EA or at [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com).

### **The purposes and legal basis for processing your personal information**

Processing is necessary for the performance your contract with PPS and for the issue and operation of Cards and is necessary for compliance with legal obligations applicable to PPS. PPS does not use your personal information for marketing purposes and will not share your information with third parties for marketing purposes.

### **Categories of personal information and collection**

<b>Type of personal information</b>	<b>Description</b>
Personal Details	Full name and date of birth
Contact Details	Where you live and how to contact you including phone numbers and e-mail addresses
Transactional and Card Data	Details about your Card, use of your Card and payments to and from your accounts
Contractual information	Details about the products or services we provide to you
Locational Data	Data we get about where you are, such as may come from your mobile phone, the address where you connect a computer to the internet, or a shop where you buy something with your Card
Behavioural Data	Details about how you use our products and services
Technical Data	Details on the devices and technology you use
Communications	What we learn about you from letters, emails and conversations between us
CDD&KYC Data	Details about you that are stored in documents in various formats, or copies of them. This could include things like your passport, drivers licence or birth certificate collected to fulfil customer due diligence requirements

Personal information will only be collected directly and voluntarily from you as part of the application process or as a result of transactions relating to your Cards. Some personal information may be verified by PPS with use of publically accessible sources and subprocessors to fulfil customer due diligence.

## **Sending personal information outside of the UK or the EEA**

PPS will only send your personal information outside of the UK or the European Economic Area (EEA) to:

- Follow your instructions
- Comply with a legal duty

In relation to personal information processed by Mastercard certain processors are located outside of Europe. Personal information processed by Mastercard is subject to Mastercard Binding Corporate Rules which you have enforcement rights under as a third-party beneficiary.

You may access the Mastercard Binding Corporate Rules here:

<https://www.mastercard.us/content/dam/mccom/global/documents/mastercard-bcrs.pdf>

## **Recipients (or categories of recipients) of personal information**

PPS is committed to ensuring that your information is secure with us and with third parties who act on our behalf. These third parties include MasterCard, card manufacturers, suppliers of identity validation services, IVR and call recording (telephone) suppliers and (if relevant) Yolt (this party is identifiable by the branding on your card). We use many tools to make sure that your information remains confidential and accurate and we may monitor or record calls, emails, text messages or other communications in order to protect you and us.

## **Exchange of data with Yolt**

PPS will exchange the personal information in this Privacy Policy with ING Bank NV., Yolt Limited, Yolt BV and other Yolt entities organized under Yolt Group BV to deliver you the Card and the Account in the Yolt App. Furthermore personal information is shared by PPS with ING Bank NV and the Yolt entities to support PPS in complying with its legal obligations.

Use of your personal information by Yolt is governed by the applicable Yolt Privacy Policy which can be found here: [www.yolt.com/privacy](http://www.yolt.com/privacy).

## **Retention of personal information**

We don't keep your information for longer than we need to, which is usually up to 7 years after the end of the relationship or upon termination of the contract, unless we are required to keep it longer (for example due to a court order or investigation by law enforcement agencies or regulators).

## **Your Rights**

You have certain legal rights to control what we do with your information. These include:

<b>Access</b>	You have a right to access the personal information we hold about you
<b>Rectification</b>	You have a right to rectification of inaccurate personal information and to update incomplete personal information
<b>Erasure</b>	You have a right to request that we delete your personal information
<b>Restriction on processing</b>	You have a right to request us to restrict a processing of your personal information
<b>Objection to processing</b>	You have a right to object to the processing of your personal information
<b>Portability</b>	You have a right to personal information portability
<b>Marketing</b>	You have a right to object to direct marketing

To exercise any of your legal rights, you can also email PPS at [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com) or you can write to PPS DPO at PO Box 3883, Swindon SN3 9EA.

As your E-Money Account is integrated in the Yolt App, personal information on your use of the Yolt App (such as information on connected accounts, Yolt marketplace activities and certain CDD/KYC data) is accessible and downloadable in the Yolt App.

For additional requests or questions about the personal data we hold about you (such as the transactions on your E-Money Account) you can contact and request this with PPS at [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com).

## **Your right to lodge a complaint with the Information Commissioner's Office**

If you wish to raise a complaint on how we have handled your personal information, you can contact our Data Protection Officer. We hope that we can address any concerns you may have, but if we fail to address your complaint you can contact the Information Commissioner's Office (<https://ico.org.uk/>).

## **Financial crime prevention**

PPS will use your personal information to help decide if your accounts may be being used for fraud or money-laundering. We may detect that an account is being used in ways that fraudsters work or we may notice that an account is being used in a way that is unusual. If we think there is a risk of fraud, we may stop activity on the accounts or refuse access to them. We might also check and share your information with fraud prevention

agencies. If fraud is identified or suspected, these agencies may keep a record of that information and we may refuse to provide any services. Law enforcement agencies may access and use this information.

**If you choose not to give personal information**

If you choose not to give us your personal information, it may mean that we cannot perform services needed to run your Card. It could mean that we cancel your Card or services you have with us.