

Soldo Privacy Notice

At Soldo Financial Services Ltd. and Soldo Ltd., we'll never misuse your data, we'll stick to the letter and spirit of the law. We'll never sell it, give it away or use it for anything other than to deliver or improve our services to you. To learn more about how we use your data — and how we keep it safe — please take a moment to review our privacy notice.

- **Who we are**

Data controllers are (a) Soldo Financial Services Ltd. and (b) Soldo Ltd. Their address is Charles House 108-110, Finchley Road London NW3 5JJ. (thereinafter “**Soldo**”).

- **Why we collect your data**

There are several different reasons for collecting your data.

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 didn't collect this data, we wouldn't be able to send your money.

Legal obligation: We have to collect some of your data by law. This is called a 'legal obligation'.

Legitimate interest: This means we can collect and use your data for legitimate business reasons, 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'll find it at the bottom of every email.

Consent: This means that you give us permission to collect and use some of your data for a specific reason. You can withdraw consent whenever you want.

Why do we collect and use your data?

On what grounds?

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

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

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

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

To manage, analyse and improve our services. **Legitimate interest**

To personalise your Soldo 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**

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

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

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**

If you agree, to give you information about the other businesses we work with. **Consent**

- **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're 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, 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.

Technical data

We might collect information about the kind of device you're using - like whether it's a phone, a laptop, or a tablet, and where in the world you're 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're logging in from the web, or from the Soldo app.

- **What data we receive**

Soldo works with other companies of its group, a variety of other third 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.

The companies that share information with us could be the banks that handle you and your recipient's money, other financial services, social media sites, online search engines, analytics services, credit reference agencies, government agencies, law enforcement.

- **How we share your information**

Some of the companies of our group need your data to provide our services to you. 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 provide our services to you or carry out your funds transfers.

- **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 privacy@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 Union. For example, if we receive a request for information from a United States law enforcement agency we may be obliged to provide your data.

- **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.

<p>Access – 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 Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p>
<p>Rectification – 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 Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p>
<p>Erase – 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"> • we no longer need to process your information for the purposes for which it was provided; • we have requested your permission to process your personal information and you wish to withdraw your consent; or • we are not using your information in a lawful manner. <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</p>

	<p>or contact us at Soldo Financial Services Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p>
<p>Restriction – 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"> • any of the information that we hold about you is inaccurate; • 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 • we are not using your information in a lawful manner. <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 Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p>
<p>Portability – You have a right to data portability.</p>	<p>Where we have requested your permission 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 Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p>
<p>Objection – 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. 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</p>

	<p>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 Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p>
<p>Marketing – 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>Withdraw consent – You have a right to withdraw your consent.</p>	<p>Where we rely on your permission to process your personal information, you have a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities. Please write to or contact us at Soldo Financial Services Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p>
<p>Lodge complaints – 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 Ltd. or Soldo Ltd., Charles House, 108-110 Finchley Road, London NW3 5JJ, or email privacy@soldo.com.</p> <p>We hope that we can address any concerns you may have, but you can always contact the Information Commissioner’s Office (ICO). For more information, visit ico.org.uk.</p>