

## Mobile App Privacy Policy

### Consent to Installation of the App

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This information is provided in the Simplifi Privacy Policy and it is important that you read that information.

### How You Can Withdraw Your Consent

You may change your mind and withdraw consent at any time by contacting us at [support@simplifi.co.uk](mailto:support@simplifi.co.uk), but that will not affect the lawfulness of any processing carried out before you withdraw your consent.

### Introduction

This Mobile App Privacy Policy (“**Policy**”) (together with our app terms of use (“**App Terms**”) and terms of service (“**Service Terms**”) and any additional terms of use incorporated by reference into the App Terms or Service Terms applies to your use of:

- Simplifi mobile application software (“**App**”) hosted on the Apple and/or Google app store, once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (“**Device**”).
- Any of the services accessible through the App (“**Services**”).

This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This policy is provided in a layered format so you can click through to the specific areas set out below.

### Important Information and Who We Are

Simplifi Financial Solutions Limited (collectively referred to as “**Simplifi**”, “**we**”, “**us**” or “**our**” in this Policy) is the data controller and is responsible for your personal data.

### Contact Details

Our full details are:

- Full Name of Legal Entity: Simplifi Financial Solutions Limited.
- Email Address: [support@simplifi.co.uk](mailto:support@simplifi.co.uk).
- Postal Address: Unit 6 Queens Yard, White Post Lane, London E9 5EN, United Kingdom.

You have the right to make a complaint at any time to the Information Commissioner's Office (“**ICO**”), the UK supervisory authority for data protection issues. However, we ask that you contact us before exercising your right in this manner.

### Changes to the Privacy Policy and Your Duty to Inform Us of Changes

We keep our privacy policy under regular review.

This version was last updated on May 14, 2021. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App. The new policy may be displayed on-screen, and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

### Third Party Links

Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

### The Data We Collect About You

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data.
- Contact Data.
- Financial Data.
- Transaction Data.
- Device Data.

- Profile Data.
- Usage Data.
- Marketing and Communications Data.
- Location Data.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### How is Your Personal Data Collected?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App, download or register an App. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you use our App we will automatically collect personal data including Device, Content, and Usage Data.

### How We Use Your Personal Data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

See the GLOSSARY (below) to find out more about the types of lawful basis that we will rely on to process your personal data.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

### Purposes for Which We Will Use Your Personal Data

<b>Purpose/Activity</b>
To install the App and register you as a new App user
<b>Type of Data</b>
Identity, Contact, Financial, Device
<b>Lawful Basis for Processing</b>
Performance of a contract we are about to enter or have entered with you.

<b>Purpose/Activity</b>
To process lending operations and deliver Services including managing payments and collecting money pursuant to duly executed Borrower’s Agreements (as defined in the Terms)
<b>Type of Data</b>
Identity, Contact, Financial, Transaction, Device
<b>Lawful Basis for Processing</b>
Your consent; Performance of a contract with you

<b>Purpose/Activity</b>
To manage our relationship with you including notifying you of changes to the App or any Services
<b>Type of Data</b>
Identity, Contact, Financial, Profile
<b>Lawful Basis for Processing</b>
Your consent; Performance of a contract with you; Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/Services); Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)

<b>Purpose/Activity</b>
To administer and protect our business and this App including troubleshooting, data analysis and system testing
<b>Type of Data</b>
Identity, Contact, Device
<b>Lawful Basis for Processing</b>
Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)

## Disclosures of Your Personal Data

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the tables above (Purposes for Which We will Use Your Personal Data):

- CashDash UK, regulated by the UK Financial Conduct Authority as an eMoney Institute (EMI) with reference number 900769, that is providing wallet infrastructure and payment services;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

## International Transfers

We will only ever transfer your personal data for processing by trusted partners in the United Kingdom and European Economic Area.

## Data Security

All information you provide to us is stored on our secure servers.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

## Data Retention

In some circumstances you can ask us to delete your data: see **Your Legal Rights** below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In the event that you do not use the App for a period of 24 months then we will treat the account as expired and your personal data may be deleted.

## Your Legal Rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data:

- **Right to request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Right to object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your

information which override your rights and freedoms

- **Right to request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (a) if you want us to establish the data's accuracy;
  - (b) where our use of the data is unlawful but you do not want us to erase it;
  - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to request the transfer** of your personal data to you or to a third party. We will provide

to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## Glossary

### Lawful Basis

- **Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed, and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.
- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.
- **Third Parties**
  - *External Third Parties*
  - Service providers acting as processors based in the UK and EU who provide IT and system administration services.
  - HM Revenue and Customs, regulators, and other authorities based in the UK who require reporting of processing activities in certain circumstances.

### Descriptions of Categories of Personal Data

- **Identity Data:** first name, last name, maiden name, username or similar identifier, date of birth
- **Contact Data:** email address and telephone numbers
- **Financial Data:** [bank account and payment card details
- **Transaction Data:** includes details about payments to and from you and details of in-App purchases.
- **Device Data:** includes the type of mobile device you use.
- **Profile Data:** includes your username and password, in-App purchase history, your interests, preferences, feedback and survey responses.

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- **Usage Data:** includes details of your use of any of our Apps including, but not limited to, traffic data.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.