

**SHIELDPAY
PRIVACY NOTICE
VERSION 1.0**

1 PURPOSE

- 1.1** Shieldpay Ltd (Company number 10061792) with a registered office at 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, WA14 2DT, United Kingdom (**ShieldPay, we, us** or **our**) provides the products and services offered on the ShieldPay website and/or mobile application www.Shieldpay.com (**Platform**).
- 1.2** For the purposes of the *Data Protection Act 1998 (Act)*, we are the data controller with Information Commissioner Office registration number ZA197669.
- 1.3** We have adopted this policy to ensure that we have standards in place to protect the data that we collect about individuals that is necessary and incidental to:
- (a) providing the products and services that we offer; and
 - (b) the normal day-to-day operations of our business.
- 1.4** By publishing this policy we aim to make it easy for our users, customers and the public to understand what data we collect and store, why we do so, how we receive and/or obtain that information, and the rights an individual has with respect to their data in our possession.

2 WHO AND WHAT THIS POLICY APPLIES TO

- 2.1** We handle data in our own right and also for and on behalf of our customers and users.
- 2.2** Our policy does not apply to information we collect about businesses or companies, however it does apply to information about the people in those businesses or companies which we store.
- 2.3** The policy applies to all forms of information, physical and digital, whether collected or stored electronically or in hardcopy.
- 2.4** If, at any time, an individual provides data or other information about someone other than himself or herself, the individual warrants that they have that person's consent to provide such information for the purpose specified.
- 2.5** ShieldPay is not available to children (persons under the age of 18 years).

3 THE INFORMATION WE COLLECT

- 3.1** In the course of business it is necessary for us to collect data. This information allows us to identify who an individual is for the purposes of our business, share data when asked of us, contact the individual in the ordinary course of business and transact with the individual. Without limitation, the type of information we may collect is:
- (a) **Personal Information.** We may collect personal details such as an individual's name, location, date of birth, passport, driver's license and other information that allows us to identify who the individual is;

- (b) **Contact Information.** We may collect information such as an individual's email address, mobile and/or landline telephone number, third-party usernames, residential and business address, and other information that allows us to contact the individual;
- (c) **Financial Information.** We may collect financial information related to an individual about payments made and received, such as the date, amount, currency and the details of the payee or payer and other information that allows us to transact with the individual and/or provide them with our services;
- (d) **Statistical Information.** We may collect information about an individual's online and offline preferences, habits, movements, trends, decisions, associations, memberships, finances, purchases and other information for statistical purposes;
- (e) **Device Information.** We collect device-specific information, such as the hardware model, operating system version, advertising identifier, unique application identifiers, unique device identifiers, browser type, language, wireless network, and mobile network information (including the mobile phone number); and
- (f) **Information an individual sends us.** We may collect any personal correspondence that an individual sends us, or that is sent to us by others (such as credit reference or fraud prevention agencies) about the individual's activities, including activities with our third party partners.

3.2 We may collect other data about an individual, which we will maintain in accordance with this policy.

3.3 We may also collect anonymous non-data about an individual such as information regarding their computer, network and browser (including include an IP address).

4 HOW INFORMATION IS COLLECTED

4.1 Most information will be collected in association with an individual's use of ShieldPay, our products and services, an enquiry about ShieldPay or generally dealing with us. However, we may also receive data from other sources such as advertising, an individual's own promotions, public records, mailing lists, contractors, staff, recruitment agencies and our business partners. In particular, information is likely to be collected as follows:

- (a) **Registrations/Subscriptions/Purchases.** When an individual registers, subscribes and or purchases a product, service, list, account, connection or other process whereby they enter data details or grant access to information in order to receive or access something, including a transaction or services;
- (b) **Accounts/Memberships.** When an individual submits their details to open an account and/or become a member with us;
- (c) **Partners.** When an individual grants us access to their accounts or allows information to be shared by our business partners.
- (d) **Supply/Contact.** When an individual supplies us with goods or services. or contacts us in any way;

(e) **Pixel Tags.** Pixel tags and web beacons may enable us to send email messages in a format customers can read and they tell us whether mail has been opened.

4.2 As there are many circumstances in which we may collect information both electronically and physically, we will endeavour to ensure that an individual is always aware of their data being collected, in particular by third parties.

4.3 We may also collect anonymous non-data, which may be used and shared on an aggregated and anonymous basis.

5 HOW DATA IS STORED

5.1 The data that we collect from you will be stored in the European Economic Area (EEA), but may be transferred to, and stored at, a destination outside the EEA, with and by third parties.

5.2 Data may also be processed by third parties and/or staff operating outside the EEA who work for us or for one of our third party partners. By submitting your personal data, you agree to this transfer, storing or processing.

5.3 We will retain data for the period necessary to fulfil the purposes outlined in this policy unless a longer retention period is required or permitted by law.

6 WHEN DATA IS USED

6.1 In general, we will only use any data for the purpose for which it was collected, except with the individual's permission. The purpose of collection is determined by the circumstances in which the information was collected and/or submitted.

6.2 Information is used to enable us to provide operate our business, especially as it relates to an individual. This may include:

- (a) the provision of ShieldPay and related services to an individual;
- (b) verifying an individual's identity;
- (c) communicating with an individual about:
 - i their relationship with us;
 - ii our services;
 - iii our marketing and promotions to customers and prospects; and/or
 - iv competitions, surveys and questionnaires;
- (d) investigating any complaints about or made by an individual, or if we have reason to suspect that an individual is in breach of any of our terms and conditions or that an individual is or has been otherwise engaged in any unlawful activity;
- (e) carrying out regulatory checks and meeting our obligations to our regulators;
- (f) preventing and detecting fraud, money laundering and other crime (such as identity theft);

(g) preparing high-level anonymised statistical reports, which would contain details such as the average number of company directors being authorised signatories to a company's accounts. The information in these reports is never personal and you will never be identifiable from them. We may share these statistical and anonymised reports with third parties including non-ShieldPay companies; and/or

(h) as required or permitted by any law (including the Act).

6.3 If you publicly post about ShieldPay, or communicate directly with us, on a social media website, we may collect and process the data contained in such posts or in your public profile for the purpose of addressing any customers services requests you may have and to monitor and influence public opinion ShieldPay.

7 WHEN DATA IS DISCLOSED

7.1 Upon your authorisation and instruction, to your advisers (such as accountants, lawyers, financial or other professional advisers).

7.2 It may be necessary for us to disclose an individual's data to third parties in a manner compliant with the Act in the course of our business, such as for processing activities like verification, due diligence, website hosting, data analytics and payment processing.

7.3 We will not disclose or sell an individual's data to unrelated third parties under any circumstances unless we employ other companies to perform tasks on our behalf and we need to share your information with them to provide products and services to you.

7.4 There are some circumstances in which we must disclose an individual's information:

(a) where we reasonably believe that an individual may be engaged in fraudulent, deceptive or unlawful activity that a governmental authority should be made aware of;

(b) as required by any law (including the Act) including court orders;

(c) as required by UK and overseas regulators and authorities in connection with their duties, including the regulator or authority having access payment details (including information about others involved in the payment);

(d) fraud prevention agencies, in particular, we will always tell fraud prevention agencies if you give us false or fraudulent information. They will also allow other organisations (in the UK or abroad), including law enforcement agencies to access this information to prevent and detect fraud, money laundering or other crimes; and/or

(e) in order to sell our business (as we may transfer data to a new owner).

7.5 We will not disclose an individual's data to any entity outside of the United Kingdom that is in a jurisdiction that does not have a similar regime to the Act or an implemented and enforceable privacy policy similar to this policy. We will take reasonable steps to ensure that any disclosure to an entity outside of the United Kingdom will not be made until that entity has agreed in writing with us to safeguard data as we do.

- 7.6 If the Company gets involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of all or some portion of the business to another company, we may share information with that company before and after the transaction closes.

8 THIRD PARTY SERVICES, WEBSITES AND ACCOUNTS

- 8.1 We may share an individual's information with third party service providers in connection with the provision of ShieldPay and related services to you, and otherwise operating our business. We may link your account with a third party to our services to enable certain functionality, which allows us to obtain information from those accounts.

- 8.2 For example:

- (a) authentication of identity, passport and driver's license (such as AU10TIX, Onfido, GB Group, Trulio);
- (b) all information may be process and stored with cloud service providers (such as Amazon Web Services);
- (c) information may be required to communicate with an individual (such as Gmail from Google, Inc); or
- (d) when you click on links to third party websites.

- 8.3 We are not responsible for the privacy practices of third parties. You must read the privacy policies of third party service providers, so you can understand the manner in which they will handle your personal information. The information we may obtain from those services often depends on their privacy policies or account settings.

- 8.4 These service providers may be located or have facilities that are located a different jurisdiction (including outside the EEA), in which case your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

9 COOKIE POLICY

- 9.1 Our Platform may use cookies to distinguish you from other users of our Platform. This helps us to provide you with a good experience when you browse our Platform and also allows us to improve our Platform. By continuing to browse the site, you are agreeing to our use of cookies.

- 9.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device if you agree. Cookies contain information that is transferred to your device's hard drive. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Platform.

- 9.3 Please refer to our <Cookie Policy> for further information.

10 CONSENT TO COLLECTION OF DATA

- 10.1 An individual may opt to not have us collect their data and communicate with them at certain times. This may prevent us from offering them some or all of our services and

may terminate their access to ShieldPay, or other services they access with or through us.

(a) **Opt In.** Where relevant, the individual will have the right to choose to have information collected and/or receive information from us; or

(b) **Opt Out.** Where relevant, the individual will have the right to choose to exclude himself or herself from some or all collection of information and/or receiving information from us.

10.2 If an individual believes that they have received information from us that they did not opt in or out to receive, they should contact us on the details below.

11 THE SAFETY & SECURITY OF DATA

11.1 We will take all reasonable precautions to protect an individual's data from unauthorised access. This includes appropriately securing our physical facilities and electronic networks.

11.2 The security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. Each individual that provides information to us via the internet or by post does so at their own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, data where the security of information is not within our control.

11.3 We are not responsible for the privacy or security practices of any third party (including third parties that we are permitted to disclose an individual's data to in accordance with this policy or any applicable laws). The collection and use of an individual's information by such third parties may be subject to separate privacy and security policies.

11.4 If an individual suspects any misuse or loss of, or unauthorised access to, their data, they should let us know immediately.

11.5 We are not liable for any loss, damage or claim arising out of another person's use of the data where we were authorised to provide that person with the data.

12 HOW TO ACCESS AND/OR UPDATE INFORMATION

12.1 The Act gives you the right to request from us the data that we have about you.

12.2 If an individual cannot update his or her own information, we will correct any errors in the data we hold about an individual within 7 days of receiving written notice from them about those errors.

12.3 It is an individual's responsibility to provide us with accurate and truthful data. We cannot be liable for any information that is provided to us that is incorrect.

12.4 We may charge an individual a reasonable fee for our costs incurred in meeting any of their requests to disclose the data we hold about them.

13 COMPLAINTS AND DISPUTES

13.1 If an individual has a complaint about our handling of their data, they should address their complaint in writing to the details below.

13.2 If we have a dispute regarding an individual's data, we both must first attempt to resolve the issue directly between us.

13.3 If we become aware of any unauthorised access to an individual's data we will inform them at the earliest practical opportunity once we have established what was accessed and how it was accessed.

14 ADDITIONS TO THIS POLICY

14.1 We reserve the right to modify this policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Platform. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

14.2 If we decide to change this policy, we will post the changes on our Platform at www.ShieldPay.com/privacy. It is your responsibility to refer back to this policy to review any amendments. We may do things in addition to what is stated in this policy to comply with the Act and nothing in this policy shall deem us to have not complied with the Act.

15 CONTACTING US

15.1 All correspondence relating to privacy should be addressed to (by email where possible):

support@shieldpay.com
The Data Controller
ShieldPay Ltd
3rd Floor, 1 Ashley Road
Altrincham
Cheshire
WA14 2DT
United Kingdom