

## Privacy Policy

### Use of personal information and privacy policy

#### **Who we are**

easyBusiness is a trading name of Volopa Financial Services (Scotland) Limited.

As Volopa Financial Services (Scotland) Limited (referred as Volopa for this notice) we gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Volopa Financial Services (Scotland) Limited's registered office is at Dentons UK and Middle East LLP, 1 George Square, Glasgow, G2 1AL. We are a company registered in England and Wales under company number SC399401. We are registered on the Information Commissioner's Office Register; registration number Z2993099, and act as the data controller/data processor when processing your data. Our designated Data Protection Officer who can be contacted via email at [customersupport@volopa.com](mailto:customersupport@volopa.com) with the subject line "Data Protection Officer" or via post at Volopa Financial Services (Scotland) 15 Belgrave Square London, SW1X 8PS.

For prepaid card related business, the joint data controller within the UK and EU is:

#### **Moorwand Limited**

Fora, 3 Lloyds Avenue, London, EC3N 3DS, United Kingdom.

E-mail: [legal@moorwand.com](mailto:legal@moorwand.com)

In the UK, a client can complain to the Information Commissioner's Office <https://ico.org.uk/>

Registered address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Telephone: 0303 123 1113; Fax: 01625 524510

Moorwand DPO Name: David Campbell

Email: [legal@moorwand.com](mailto:legal@moorwand.com); subject line "Data Protection Officer"

#### **Information that we collect**

Volopa processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** includes first name, maiden name, last name, title and date of birth as well as KYC data such as passports, driving licenses and utility bills.
- **Contact data** includes email address, home address and telephone numbers.
- **Transaction data** includes details about payments or card transactions made using our services.
- **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage data** includes information about how you use our website and services.
- **Marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### How we use your personal data

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

- Where we need to perform the contract we are about to enter into or have entered into 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.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

### Purposes for which we use your personal data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below. We do not process your data for automated decision-making or profiling purposes.

**Purpose/Activity**

**Type of data**

**Lawful basis for processing including basis of legitimate interest**

<b>To respond to your enquiry raised using our enquiry form on our website</b>	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running a business)
<b>To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy</b>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
<b>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</b>	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
<b>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</b>	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
<b>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</b>	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

**To make suggestions and recommendations to you about goods or services that may be of interest to you**

- (a) Identity
- (b) Contact
- (c) Technical
- (d) Usage
- (e) Profile

Necessary for our legitimate interests (to develop our products/services and grow our business)

## **Disclosure of your information**

We may share your information with selected third parties including:

- Business partners, suppliers, and sub-contractors for the performance of any contract we enter into with [them or] you, including without limitation any data processor we engage.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Firm Name, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transfers will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try and prevent unauthorised access.

## **How long we keep your data**

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Details of retention periods for different aspects of your personal data are available upon request.

We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after you cease being a client. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

### **Your rights**

You have the right to view any personal information that Volopa holds about you, including:

- Personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If you wish to exercise any of your rights as detailed above, please send an email to [customersupport@volopa.com](mailto:customersupport@volopa.com) with “Data Protection Officer” in the subject line.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure. In most cases, exercising your rights will be free of charge and must be provided within one month of receipt.

If you have a complaint about data protection at Volopa, please contact our data protection officer at [customersupport@volopa.com](mailto:customersupport@volopa.com) with “Data Protection Officer” in the subject line. Alternatively, you may get in touch with our supervisory authority for data protection compliance at: [www.ico.org.uk](http://www.ico.org.uk):

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

### **Consequences of not providing your data**

You are not obligated to provide your personal information to Volopa, however, as this information is required for us to provide you with many of our services, we may not be able to offer some/all our services without it.

### **Cookies policy**

Our website, like most websites, uses cookies. Cookies are harmless small files that your web browser accepts and stores on your computer whenever you're browsing the site. We use cookies for several reasons:

- Cookies help us 'remember' you, so that every time you use our web site, your experience is a little bit smoother. Don't worry, we don't store any personally identifiable information that we haven't asked you for.
- Cookies make sure we don't treat you like every other user. We understand your interests, suggest the right things to you and ensure that your time on your site is always tailored to your specific needs. If it weren't for cookies, we'd have to treat you and every other user like you'd never been on the site before.
- Cookies help us see the way our users use this site. By studying these patterns we know how to make the content more user friendly, and if need be, how to prevent any potential fraudulent activity.

By continuing to use our site, you're agreeing to let us place Cookies on your device so we can access them the next time you're on the site.

### **Cookies we use**

- **Cookies to measure web usage:** Cookies we use when we're trying to understand how many people visit our site, which pages are popular and which pages are not. These cookies help us make sure your experience of the site only gets better.
- **Cookies from social networks:** To make sure you can use your social networks without interruption when you're on our site we allow them to send cookies. We can't see what their cookies read and they can't see what our cookies read. We only allow them so that they can understand the way you use their sites, in the same way we use our cookies to understand how you use our site.

- **Cookies for ads:** A big part of advertising online is understanding which ads work and which ads don't. It's also important to make sure that people are getting ads that suit their interests. To do so, ad hosts need to use cookies to monitor how users are responding to ads.
- **Cookies for signing in:** We use cookies to remember details about you we don't think you should have to type out every time. These are the cookies that make sure the website remembers things like your user ID.
- **Cookies for content:** When we use content from other sites, they use cookies to understand how you're consuming their content and what content they should suggest to you.
- **How to delete cookies:** If you want to restrict or block the cookies we use, you can do so by deleting the temporary internet files and/or cookies from the settings in your browser. If you want to delete the cookies from a browser on a mobile device, you should check your device manual.

### **Learn more**

- To find out more about cookies and the laws surrounding the use of cookies visit [www.aboutcookies.org](http://www.aboutcookies.org).
- To find out more about our security and privacy measures, you can view our Terms and Conditions.
- To learn more about our privacy policy and use of cookies, feel free to send a mail to [customersupport@volopa.com](mailto:customersupport@volopa.com).

### **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

### **Contact**

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to [customersupport@volopa.com](mailto:customersupport@volopa.com).