



# eversend

## PRIVACY NOTICE

(Updated on 23 January 2024)

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## 1. Introduction

At Eversend, we care about the privacy of the people who use our services and interact with us, and this notice explains how we deal with the personal information that you give us.

This notice applies to the use of our services, for example visiting our website, using the Eversend App, or any of the services available to you through the Eversend App or website.

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use, and share any information relating to you (your personal data) in connection with your use of our services. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

## 2. About Us

The Eversend group is made up of **different companies**. We'll let you know which Eversend Company you have a relationship with when you first apply for the use of an Eversend product or service.

The Eversend company providing the relevant product or service to you will be responsible for processing your personal data for that product or service. This Eversend Company is known as the 'Controller' of your personal data.

## 3. What this Notice Applies to

This notice applies to:

- Our website accessible at [www.eversend.co](http://www.eversend.co);
- The Eversend App;
- Any of the services available to you and accessed through the Eversend App or website or through USSD.

We may also collect your personal data from other sources. We explain how and when this can happen in the subsequent parts of this notice.

Depending upon which of our products or services you use or how you contact us we may also need to provide you with additional information about the use of your **personal data** – this extra information shall always be availed to you before we collect any of your data.

By personal data, we mean information which:

- We know about you (for example we know when you use the Eversend App to send money)
- Can be used to personally identify you (for example, a combination of your name and telephone number or email address)

This notice explains what information we collect, how we use it, and your rights if you want to change how we use your personal data.

If you have any questions or concerns in relation to your personal data, you can contact our Data Protection Officer mailto: [data@eversend.co](mailto:data@eversend.co).

#### 4. Personal Data we collect about you

The personal data we collect about you depends on the particular Eversend product and services you request or use. We will collect and use the following personal data about you:

Type of Personal Data	Details of Personal Data Collected
Information You Provide <b>“Submitted Information”</b>	<p>We collect information you provide when you:</p> <ul style="list-style-type: none"> <li>• Fill in any forms</li> <li>• Correspond with us</li> <li>• Participate in any of our surveys or promotions</li> <li>• Register to use the Eversend App</li> <li>• Open an account or use any of our services</li> <li>• Take part in online discussions including engagements with our social media accounts</li> <li>• Speak with a member of our customer support through mail, social media, phone, or through the Eversend App</li> <li>• Contact us for other reasons</li> <li>• Top-up, send money (mobile money and bank transfer) and electronic money exchange</li> </ul> <p>The information we collect includes:</p> <ul style="list-style-type: none"> <li>• Your name, address, and date of birth</li> </ul>

	<ul style="list-style-type: none"> <li>● Your phone number, email address, and details of your device</li> <li>● Your Eversend username, when you create and Eversend tag</li> <li>● Your registration information</li> <li>● Details of your credit and debit cards you have registered with us including the card number, expiry date, and CVC (the last three digits on the back of the card)</li> <li>● Your country of residence, tax identification number</li> <li>● Copies of your identification documents</li> <li>● Details of your bank account, including the account number, sort code, and/or IBAN</li> <li>● Records of your communication with us, if you contact us or we contact you (including records of phone calls)</li> <li>● Your image in photo or video form submitted as part of our KYC (Know-Your-Customer) checks, to verify your identity and when you upload a photo to your Eversend account.</li> <li>● Details of your beneficiaries submitted when processing a payment or money transfer</li> <li>● And any other information you provide us in order to prove your eligibility to use our services.</li> </ul> <p>We process this information based on our contractual necessity to provide you with our services, and where necessary your consent.</p>
<p>Information collected from your use of our products and services</p>	<p>Whenever you use the Eversend App or visit our website, we collect the following information:</p> <ul style="list-style-type: none"> <li>● Technical information, including the internet protocol (IP) address used to connect your device to the internet, your login information, browser type and</li> </ul>

version, time zone setting, browser plug-in types and versions, operating system and platform, device information and type, unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's network interface, or the mobile phone number used by the Device), mobile network information and operating system

- Information about your visit, including the full uniform resource locators (URL), clickstream to, through and from our website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain page, device information
- Transaction information including date, time, amount, currencies used, exchange rate, beneficiary details, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment instrument used
- Information stored on your device, including if you allow Eversend access contact information from your address book, login information, photos, videos or other digital content, check-ins (Content Information). The App will periodically recollect this information in order to stay up-to-date
- Details of your use of our App or your visits to our Site including transaction details relating to your use of our services, including who you have sent money or electronic money to, foreign exchange transactions you have entered into, the

	<p>time, date and location of the place the transaction was entered into</p> <p>We process this information based on our legitimate interests to improve our services and provide a personalised user experience.</p>
<p>Information about your location</p>	<p>We use GPS technology and your IP address to determine your location, this is used when the App is running in the foreground and the background of your Device. This is used to prevent fraud, for instance, if your mobile phone is saying that you are based in France but your information is being used to enter into a transaction in Italy, we may not allow that transaction to be processed.</p> <p>Our card protection and fraud-prevention measures require this personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose.</p> <p>This processing is based on your consent.</p> <p>You can withdraw your consent at any time by disabling location permission for the Eversend App within your device settings “<b>Location Information</b>”</p>
<p>Information to help us deliver our products and services</p>	<p>We work closely with third parties in order to help us deliver our services to you. These third parties are business partners (such as those we partner with to offer additional Eversend Services like credit), sub-contractors in technical, payment, and delivery services, advertising networks, analytics providers, search information, information that helps us to verify your identity or information relating to your payment transactions.</p>

	Please see the 'Disclosure of your information' section for more information.
Information from Social Media	Occasionally, we'll use publicly available information about you from selected social media websites or apps to carry out enhanced due diligence checks. Publicly available information from social media websites or apps may also be provided to us when we conduct general searches on you (for example to comply with our anti-money laundering or sanctions screening obligations).
Information from publicly available sources	We collect information and contact details from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches and KYC purposes.

## 5. Legal basis for using your personal data

We must have a legal basis for collecting and using your personal data. Our legal basis is for either of the following:

- **Performing our contracts and agreements with you (Contractual Necessity)**

Where the processing is necessary to perform a contract with you or take steps at your request before entering into a contract. We need certain personal data to provide our products and services and cannot provide them without this personal data.

- **Legal obligations**

Where processing is necessary for compliance with a legal obligation to which we are subject. We have a legal responsibility to collect and store your personal data (for example under the anti-money laundering laws, we must collect and hold certain information about our customers and users of our products).

- **Legitimate interests**



Where the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where your interests or fundamental rights and freedoms override such interests.

- **Substantial public interest**

Where we process your personal data or your sensitive personal data (sometimes known as special category personal data), to adhere to government regulations or guidance, such as our obligation to support you if you are or become a vulnerable person.

- **Consent**

Where you have explicitly agreed to us collecting your personal data for example when you click the agree button to indicate you are happy with us collecting and using your personal data subject to the terms disclosed to you for one or more specific purposes.

## 6. How and why we use your personal data

We explain the ways in which we may use your personal data in the following table:

What we use your personal data for	Our legal basis for using your personal data
<p><b>Providing our services</b></p> <p>Whenever you sign up with Eversend, apply for or use a product or service, we'll use your personal data to:</p> <ul style="list-style-type: none"> <li>● Check your identity (as part of our KYC process)</li> <li>● Decide whether or not to approve your application</li> <li>● Meet our contractual and legal obligations relating to any products or services you use (for example making payments into and out of your Eversend wallet(s), withdrawing cash or making payments using your Eversend card)</li> </ul>	<ul style="list-style-type: none"> <li>● Our Legal basis is contractual necessity and legal obligations i.e Processing necessary to fulfill our service commitments to you.</li> </ul>

<ul style="list-style-type: none"> <li>• Help you understand your spending behaviour, how you use Eversend products and services, and to help you save money (for example by providing you with product usage and spending insights)</li> <li>• Recover debt and exercise other rights we have under any agreement with you</li> <li>• Provide you with customer support services. We may record and monitor any communications with us including phone calls, to maintain appropriate records, check your instructions, analyse, assess and improve our services, and for training and quality control purposes.</li> </ul>	
<p><b>Protection against fraud</b></p> <p>We use your personal data to check your identity against fraud, comply with financial crime laws and to confirm that you are eligible to use our services. We also use it to help us better understand your financial circumstances and manage fraud risks related to your Eversend account.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests in ensuring the security and integrity of our services</li> </ul>
<p><b>Marketing and providing products and services that might be of interest to you</b></p> <p>We use your personal data for the following:</p> <ul style="list-style-type: none"> <li>• To personalise your-in app experience (set up the appropriate wallet(s) corresponding to your location) and marketing messages about our products and services so they are more relevant and interesting to you (where the law permits). This may include analysing how you use our</li> </ul>	<ul style="list-style-type: none"> <li>• If you have consented, we use your data to provide personalised marketing messages. The legal basis for this processing is your consent, which you can withdraw at any time.</li> </ul>

<p>products and services and your transactions.</p> <ul style="list-style-type: none"> <li>• If you agree, provide you with information about our partners promotions or offers that we think you might be interested in</li> <li>• If you agree, allow our partners and other organisations to provide you with information about their products or services</li> <li>• Measure and understand the effectiveness of our marketing and advertising, and provide relevant advertising to you.</li> <li>• Ask your opinion about our products or services (reviews)</li> </ul> <p>You can stop us from sending you marketing messages by clicking the unsubscribe button at the bottom of any last message marketing message to you.</p>	
<p><b>To keep our services up and running</b></p> <p>We use your personal data to manage our website and the Eversend app, (including troubleshooting, data analysis, testing, research, statistical and survey purposes), and to make sure that content is presented in the most effective way for you and your device.</p> <p>We also use your personal data to:</p> <ul style="list-style-type: none"> <li>• Verify your identity if you contact our customer support</li> <li>• Allow you to take part in interactive features of our services</li> <li>• Inform you about changes to our services</li> </ul>	<ul style="list-style-type: none"> <li>• Performing contracts and agreements between you and us</li> <li>• Legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply to us and to present content as effectively as possible for you)</li> <li>• Consent (where required by law)</li> </ul>

<ul style="list-style-type: none"> <li>• Help keep our website and Eversend app safe and secure</li> </ul>	
<p><b>Helping with social interactions</b></p> <p>We use your personal data to help with social interactions through our services or to add extra functions in order to provide a better experience (for example, if you permit us, we use the contacts list on your phone so you can easily make payments to your contacts from the Eversend app.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests (to develop our products and services and to be efficient in meeting our obligations)</li> <li>• Consent (to access information held on your phone, for example contacts lists, and your location services)</li> </ul>
<p><b>Providing location-based services</b></p> <p>If you grant the Eversend app location services access, we use your personal data to:</p> <ul style="list-style-type: none"> <li>• Provide you with products and services</li> <li>• Protect against fraud</li> </ul>	<ul style="list-style-type: none"> <li>• Performing contracts and agreements between you and us</li> <li>• Consent (to track you when you have location services turned on)</li> </ul>
<p><b>Preparing anonymous statistical datasets</b></p> <p>We prepare anonymous statistical datasets about our customers' usage of the Eversend App and our website:</p> <ul style="list-style-type: none"> <li>• For forecasting purposes</li> <li>• To understand how customers use Eversend</li> <li>• To comply with regulatory requirements and requests</li> </ul> <p>These datasets may be shared internally or externally with others subject to confidentiality undertakings. We produce these reports using information about you and other customers. The information used and shared in this way is never personal data</p>	<ul style="list-style-type: none"> <li>• Legal obligations</li> <li>• Legitimate interests (to conduct research and analysis including to produce statistical research and reports)</li> </ul>

<p>and you will never be identifiable from it and nor can it be linked back to you as an individual.</p> <p>For example, in some jurisdictions, we have an obligation to report how money enters or leaves each country or how Eversend customers fund their accounts or transfer money. This information is not provided at the customer level, and we make it impossible to identify any individual Eversend customer</p>	
<p><b>Improving our products and services</b></p> <p>We use your personal data to help us develop and improve our current products and services. This allows us to continue to provide products and services that our customers want to use</p>	<ul style="list-style-type: none"> <li>• Legitimate interests (to understand how customers use our products so we can develop new products and improve the products we currently provide)</li> </ul>
<p><b>Meeting our legal obligations, enforcing our rights and other legal uses</b></p> <p>We use your personal data:</p> <ul style="list-style-type: none"> <li>• To share it with other entities (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies)</li> <li>• To recover debts from you</li> <li>• If it is necessary to meet our legal obligations</li> <li>• To identify and support vulnerable customers by analysing your behaviour in the Eversend app, customer support communications and through transactions (for example, we will try to identify whether you are potentially vulnerable</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests (for example to protect Eversend during a legal dispute)</li> <li>• Substantial public interest (if we process your sensitive personal data to keep to legal requirements that apply to us)</li> <li>• Legal obligations</li> </ul>

<p>so we can provide you with enhanced support. Identifying and supporting customers is a legal requirement in some jurisdictions)</p> <ul style="list-style-type: none"><li>• In connection with legal claims</li><li>• To help detect or prevent crime</li></ul> <p>Sometimes, we are legally required to ask you to provide information about other people. For example, we might ask you to explain:</p> <ul style="list-style-type: none"><li>• Your relationship with a recipient or sender of funds in your Eversend wallet</li><li>• How somebody got the money in the first place to pay into your Eversend wallet</li></ul>	
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Sometimes, we help you to provide services to your customers. For example, we provide payment processing to you if you use our Eversend Business product. Where this happens, you are responsible for deciding if we collect your customers' personal data and how we should process it on your behalf.

## 7. Automated Processing

Depending on the Eversend products or services you use, we may make automated decisions about you.

This means that we may use technology that can evaluate your personal circumstances and other factors to predict risks or outcomes. This is what is known as '**profiling**.' We do this for the efficient running of our services and to ensure decisions are fair, consistent, and based on the right information free from human error and bias.

When we make an automated decision about you, you have the right to ask that it be manually reviewed by a natural person.

We may make automated decisions about you in the following instances:

### Opening accounts

- KYC, anti-money laundering, PEP and sanction checks

- Identity and address checks

### **Transaction monitoring**

- Set transaction limits and checks.
- Process and approve transactions.

### **Detecting fraud**

- Monitoring your account to detect fraud and financial crime.

### **Approving loan applications**

- Loan and affordability checks to see whether we can accept your loan application
- Setting loan limits

### **Monitoring loan agreements**

- Assessing how you are repaying your loan with us
- Amending your loan limit
- Terminating your loan agreement

Our legal basis for the above is based on:

- Performing contracts and agreements between you and Eversend
- Legal obligations
- Legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities)

## **8. Marketing**

If you sign up for our services, we will send you information about Eversend products, services, offers, and promotions via post, push notifications, email, and text message. Where consent is needed, we will obtain it explicitly before sending any marketing messages.

We use your personal data to personalise our marketing messages to ensure they are relevant and engaging to you, based on your use of our services and transaction history, where permitted by law. A detailed explanation of the profiling techniques used for these purposes is available upon request.

You have the right to object to this profiling and to adjust your marketing preferences at any time. If you wish to stop receiving marketing communications from us, you can tap the unsubscribe link in any marketing message, adjust your preferences in the Eversend app, or inform us via our customer support channels. Following your opt-out, we will cease sending you personalised

marketing messages but may still present generic information about our products within the Eversend app.

We pledge not to share your personal details with any third party for marketing purposes without your explicit permission.

Our legal basis for processing your personal data for marketing purposes includes:

- **Consent:** For activities where the law mandates consent, we will obtain and rely on your opt-in consent, which you may withdraw at any time.
- **Legitimate Interests:** We may also process your data for direct marketing based on our legitimate interests to promote our services while ensuring that your privacy rights are considered and protected. You can object to this processing at any time.

We respect your decision and privacy and commit to ensuring transparency and control over your marketing choices.

## 9. Your rights

As a data subject, you are granted particular rights under the law with respect to your personal data which rights we uphold. We are required to inform you of your rights as shown in the table below:

Your Rights	What they mean
You have the right to be told how we use your personal data	We provide this privacy notice to explain how we use your personal data.
	If you ask, we shall provide a copy of the personal data we hold about you. We cannot give you any personal data about other people, personal data that is linked to an ongoing criminal or fraud investigation, or personal data that is linked to settlement negotiations with you. We also won't provide you with any communication we have had with our legal advisors.
You can ask us to correct your personal data if you think it is wrong	If you believe your personal data is inaccurate or incomplete, you can request that it is updated. Before we update your file, we may need to



	<p>check the accuracy of the new personal data you have provided.</p>
<p>You can ask us to delete your personal data</p>	<p>You can ask us to delete your personal data if:</p> <ul style="list-style-type: none"> <li>• There’s no good reason for us to continue using it</li> <li>• You gave us consent to use your personal data and you have now withdrawn the consent</li> <li>• You have objected to us using your personal data</li> <li>• We have used your personal data unlawfully</li> <li>• The law requires us to delete your personal data</li> </ul> <p><b>Note:</b> We may not be able to agree to your request in its entirety. As a regulated financial services provider, we must keep certain customer personal data even when you ask us to delete it. If you have closed your Eversend account, we may not be able to delete your entire file because there are regulatory obligations that take priority. We’ll always let you know if we can’t delete your personal data.</p> <p>We will provide a response to your request within one month and inform you if any exceptions apply.</p>
<p>You can object to us processing your personal data</p>	<p>You can tell us to stop using your personal data, including profiling you for marketing.</p> <p>If our legal basis for using your personal data is ‘legitimate interests’ and you disagree with us using it, you can object.</p> <p>However, if there is an overriding reason why we need to use your personal data, we will not accept your request.</p>

	<p>If you object to us using your personal data which we need to provide our services, we may need to close your account as we won't be able to provide the services.</p> <p>You can make your objection by sending an email to <a href="mailto:data@eversend.co">data@eversend.co</a></p>
<p>You can ask us to restrict how we use your personal data</p>	<p>You can ask us to suspend using your personal data if:</p> <ul style="list-style-type: none"> <li>• You want us to investigate whether it's accurate</li> <li>• Our use of your personal data is unlawful but you don't want us to delete it</li> <li>• We no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim</li> <li>• You have objected to us using your personal data, but we need to check whether we have an overriding reason to use it.</li> </ul>
<p>You can ask us to transfer your personal data to you or another company</p>	<p>If we can, and are allowed to do so under regulatory requirements, we'll provide your personal data in a structured commonly used, machine-readable format.</p>
<p>Withdrawing your permission</p>	<p>If you have given us the consent we need to use your personal data, you can withdraw it at any time by sending an email to <a href="mailto:data@eversend.co">data@eversend.co</a></p> <p>(Please note, it is lawful to use the personal data to the point you withdraw your permission.)</p>
<p>You can ask us to carry out a human review of an automated decision we make about you</p>	<p>If we make an automated decision about you that significantly affects you, you can ask us to carry out a manual review of this decision.</p>

Your ability to exercise these rights is subject to legal limitations. For example, we may be required to retain certain data for a fixed period due to legal obligations. We will provide a response to your requests within one month and inform you if any exceptions apply.

## **10. Exercising your rights**

To exercise any of your rights set out in this notice, you can reach out through the Eversend app or send us an email at [data@eversend.co](mailto:data@eversend.co).

For your security and to protect your privacy, we must verify your identity before addressing your request. We may ask you to provide a government-issued ID or other documentation to confirm your identity. If you are unable to provide such proof, we reserve the right to refuse your request.

Should a third party be acting on your behalf, they must provide evidence of their authorization to act for you, such as a power of attorney or a written consent.

We aim to respond to your request within one month. If your request is particularly complex, or if you have made several requests, it may take us longer. We will notify you and keep you updated in such cases.

Exercising your rights is generally free. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. We will inform you of any fee prior to processing your request.

If you believe your request has not been adequately addressed, you have the right to lodge a complaint with your local data protection authority.

For further information on how to exercise your rights or if you need assistance with the process, please contact us on the email provided.

## **11. Sharing your Data**

We share your data within the Eversend group of companies to:

- Provide you with the best service
- Send you information about Eversend products and services we think you will be interested in hearing about
- Complete your payment request

This is based on our legitimate business interests or your consent where required.

## **Other Eversend Customers**

We'll ask you to let us sync your mobile phone contacts. This will help you to identify which of your contacts are Eversend customers. Your contacts will also be able to see if you are an Eversend customer. This helps you easily make wallet-to-wallet payments.

We only show your basic contact details in the Eversend app, and you can also choose not to sync your contacts.

This feature is entirely optional and is based on your explicit consent which you can revoke at any time by removing access.

### **People or companies that you transfer money to**

When you make a payment from your Eversend wallet, we share transaction-related details with the other party as required by law. This typically includes your name and transaction identifiers but is limited to what is necessary for the transaction.

When you receive a payment to your Eversend wallet, we will provide the payer with your details for example your name, and IBAN where applicable. This is necessary to confirm the payment has been made to a correct account.

### **Suppliers**

We share your personal data with suppliers who assist us in providing our services. These partners are carefully selected and obligated to ensure the confidentiality and security of your data. Sharing with these partners is conducted under strict data processing terms.

<b>Type of Supplier</b>	<b>Why we share with them your personal data</b>
Suppliers who provide us with IT, payment and delivery services	To support the provision of our services
Our banking and financial services partners and payment networks including card providers	For transaction processing and financial services. This includes banking partners, banking intermediaries, aggregators and international payment service providers
Card manufacturing, personalisation and delivery companies	To create and deliver your personalised Eversend card

Analytics providers and search information providers	To enhance our website/app based on user interaction
Communications services providers	To help us send you emails, push notification and text messages

### **For legal reasons**

Your data may be shared with authorities and other entities to fulfil legal obligations, protect against fraud, comply with anti-money laundering laws, or to assert our legal rights. We only do so in strict accordance with the law and where necessary for these purposes.

### **Where you ask us to share your personal data**

Where you direct us to share your personal data with a third-party, we may do so. For example, you may authorise third parties to act on your behalf (such as a lawyer, accountant, legal representative, guardian or holder of a power of attorney). We may need to ask for proof that a third party has been validly authorised to act on your behalf.

### **Unintended Transfers**

Occasionally, we may need to share your information with other institutions or customers, for instance, if a payment is made in error. Such sharing is performed under legal compulsion and is executed with the utmost care for your privacy rights.

### **Your Control**

You have the right to object to any use of your personal data that is not consistent with the purposes for which it was collected. If you have any concerns about how your data is shared, please contact us at [data@eversend.co](mailto:data@eversend.co).

## **12. Where we store your data**

We primarily store your data in the country where it's collected. Additionally, we maintain servers in the United Kingdom and the European Economic Area (EEA) to support our services globally.

Given the international scope of our services, it may be necessary to transfer your personal data beyond your country, the UK, or the EEA to facilitate international transactions or for service efficiency. For instance, international

payments may involve transferring funds to banks located in countries outside of these regions.

### **Ensuring Protection in Data Transfers**

When we transfer your personal data to countries that may not have equivalent data protection laws as found in your home country, the UK, or the EEA, we employ robust protection measures. This includes implementing Standard Contractual Clauses (SCCs) approved by the European Commission, ensuring these transfers meet GDPR compliance. In most cases, you have the right to request a copy of these clauses.

### **Legal Basis for International Transfers**

The legal basis for such transfers includes the performance of a contract with you, the implementation of pre-contractual measures at your request, or other bases as permitted under law.

### **Requesting Information on Data Transfers**

For more details on the specific safeguards applied to your personal data transfers or to obtain a copy of these, please reach out to us via email at [data@eversend.co](mailto:data@eversend.co), subject to any necessary redactions to protect commercial confidentiality.

## **13. Data Security**

We recognise that the security of your personal data is of paramount importance. We are committed to protecting your data with the highest standards of security, in full compliance with the law.

We have implemented a range of physical and technical safeguards designed to:

- Protect your personal data from unauthorized access, alteration, or destruction.
- Ensure the confidentiality, integrity, and availability of your data.
- Prevent the improper use or disclosure of your personal data.

Our electronic data and databases are stored on secure computer systems, and we strictly control access to your information, employing both physical barriers and advanced electronic security measures. All communications with our app, website, and services are encrypted using Transport Layer Security (TLS), ensuring that your data remains secure during transmission.

We also conduct regular data protection and information security training for our staff. They are required to adhere to our comprehensive security and data protection policies, which govern the handling of personal data.

In the unlikely event of a data breach, we have in place robust procedures to promptly identify, report, and investigate any unauthorised data handling. We will notify you and any applicable regulator of a breach where we are legally required to do so.

The security of your Eversend account also depends on your protection of your account password or PIN. You must keep your password or PIN confidential and not share it with anyone. We encourage you to use a strong password and to be alert for any unusual activity that may indicate a security breach.

We also continuously review and update our security practices to adapt to new threats and technological changes, ensuring the resilience of our systems.

#### **14. How long do we keep your personal data.**

Subject to the relevant laws, our policy is to retain personal data only for as long as necessary to fulfil the purposes for which the data was collected. The retention period may vary based on our contractual obligations, the nature of the data, and the legal requirements applicable to the data.

Generally, we retain your personal data for six years after our business relationship ends, to comply with general legal obligations and for the establishment, exercise, or defense of legal claims. In some jurisdictions, local laws may require us to retain your data for longer periods, such as 8 or 10 years, particularly for data related to financial transactions for anti-money laundering, tax and audit purposes.

We assess the retention period for different categories of personal data based on the purpose for processing, legal requirements, and the necessity of the data in relation to these purposes.

We regularly review our data retention policies to ensure that personal data is not kept longer than necessary. Upon expiration of the retention period, personal data is securely deleted or anonymised, unless further retention is required by law or is necessary for the resolution of disputes or the enforcement of agreements.

You have the right to request deletion of your personal data in certain circumstances, as per the 'right to be forgotten'.

If you wish to exercise this right or inquire about the specific retention period for your data, please contact us at [data@eversend.co](mailto:data@eversend.co).

We are committed to ensuring that your personal data is kept securely and only for durations that comply with legal obligations and are necessary for the purposes stated when collecting the data.

## **15. Changes to this notice**

We are committed to adhering to the principles of transparency and ongoing communication in our data processing activities. As such, should there be any changes to the way we handle your personal data, we will update this privacy notice accordingly.

Significant changes to our privacy practices will be communicated to you in advance via email, through the Eversend app, or on our website. This ensures you have ample time to review and understand the implications of these changes. For minor updates that do not materially alter our data processing practices, we will post the updated notice on this page and encourage you to review it regularly.

If we introduce new data processing activities that require your consent, we will inform you of these changes and provide you with the opportunity to consent before these activities begin.

You have the right to review the revised privacy notice and to alter your data processing preferences if necessary. We will take all reasonable steps to ensure that notifications of changes are conveyed in a clear, concise, and effective manner.

We recommend that you check this page frequently to stay informed of any updates or changes to our privacy notice.

## **16. Cookies**

We use cookies and similar tracking technologies to enhance your experience on our website, analyse our site usage, and assist in our marketing efforts. Detailed information about the types of cookies we use, their purposes, and their lifespans can be found in our [Cookies Policy](#).

Upon your first visit to our website, we will request your explicit consent to use non-essential cookies. You have the option to accept all cookies, reject all, or customise your preferences for different categories of cookies such as functional, analytical, or advertising cookies.





You can change your cookie preferences at any time by visiting our Cookie Settings. Additionally, most web browsers allow you to control cookies through their settings preferences.

Our marketing emails may contain pixels or web beacons, which help us to monitor the performance of our email campaigns. These track if an email is delivered, opened, and whether links within the email are clicked. We also collect information such as your IP address, browser type, and email client type for analytics purposes.

If you prefer not to be tracked by pixels or web beacons, you can unsubscribe from our marketing emails or adjust your email client settings to prevent automatic image loading. We may also use third-party service providers' cookies to provide you with a better, faster, and safer experience and for advertising purposes. Information on how to manage these third-party cookies can be found in our [Cookies Policy](#).

Our use of cookies and similar technologies for necessary website functionality is based on our legitimate interests in ensuring our website's operability. For cookies and technologies requiring consent, we will not use these without obtaining your permission first.