

TallyMoney

Privacy Policy

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P.0 — About This Policy

P.0.1 — Who we are

TallyMoney UK Ltd (“TML”, “we”, “us”, “our”) is a UK-incorporated company (company number 07089561) and a wholly-owned subsidiary of Tally Central Ltd (“TAL”), a Guernsey-incorporated company and the monetary authority of tally®. TML operates the TallyMoney Platform, through which customers hold and use physical gold as digital money.

We have appointed a Data Protection Officer (“DPO”) who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the DPO at dpo@tallymoney.com or at the address set out in P.9.1.

P.0.2 — What this policy covers

This Privacy Policy explains how TML collects, uses, stores, shares and protects your personal data when you use the TallyMoney Platform, including the TallyMoney Mobile App, TallyMoney Web App and Website at tallymoney.com (together the “TallyMoney App”).

This policy applies to all customers of TML, whether you hold an Individual Account or a Business Account. For Business Account customers, this policy also applies to all authorised users and individuals whose personal data you provide to TML.

You should read this policy carefully alongside our Customer Terms and Conditions, which govern your use of the TallyMoney Platform.

P.0.3 — Controller

TML is the data controller for all personal data collected and processed in connection with your TallyMoney Account. As the data controller, TML is responsible for deciding how and why your personal data is used.

TML works with a number of partners and service providers who may process personal data on TML's behalf as data processors, or independently as separate data controllers under their own privacy policies. All partners and service providers are required to comply with applicable data protection legislation, including the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018. Where partners act as separate controllers, they are independently responsible for their own data processing activities in accordance with their own privacy policies.

P.0.4 — Transact Payments Limited

Where you use payment services provided by TPL, including the Transact Payments Account and TallyMoney Debit Card, your personal data is processed by TPL as a separate and independent data controller under TPL's own privacy policy, available in the TallyMoney App and on the Website.

P.1 — Personal Data We Collect

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer the following kinds of personal data about you:

Identity Data — full name, username, title, date of birth and identity verification information including photographic identification and liveness verification data.

Contact Data — residential address, email address and telephone numbers.

Financial Data — bank account details, debit card details and linked account or linked card information as defined in our Terms.

Transaction Data — details of all transactions on your TallyMoney Account, including gold purchases, tally® transfers, peer-to-peer transfers, card payments, ATM withdrawals and transfers out.

Financial Circumstances Data — employment status, income, source of wealth and source of funds used to purchase tally®.

Device and Technical Data — IP address, login data, primary device identifier, browser type and version, operating system and platform, and other technical information from devices used to access the TallyMoney App or Website.

Profile Data — account preferences, feedback and survey responses.

Usage Data — information about how you use the TallyMoney App, TallyMoney Web App and Website.

Marketing and Communications Data — your preferences in receiving marketing and promotional communications from TML, including SMS and mobile messaging opt-in status.

P.1.1 — Aggregated data

We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data as it does not directly or indirectly reveal your identity. If we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data and handle it in accordance with this policy.

We do not collect Special Category Data (data relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life or sexual orientation) about you unless you voluntarily provide it and give your explicit consent for us to process it, or unless we are otherwise required or permitted to do so by law. The identification you provide to us will generally include biometric data and may include details of your racial or ethnic origin. We rely upon the legal obligation basis and your explicit consent, furnished by provision of your identification document, for processing this Special Category Data.

P.2 — How We Collect Your Personal Data

P.2.1 — Your interactions with us

We collect personal data directly from you when you:

- register for a TallyMoney Account via the TallyMoney App
- complete identity and verification checks during onboarding
- make transactions on the TallyMoney Platform
- contact us by phone, email or through the TallyMoney App
- respond to surveys, promotions or other communications
- opt in to SMS or mobile messaging services
- update your registration information or account preferences

For Business Account customers, we collect personal data about directors, beneficial owners and authorised users provided by the account applicant during the registration process.

P.2.2 — Automated technologies and interactions

When you use the TallyMoney App or Website, we automatically collect Device and Technical Data and Usage Data using cookies and similar technologies. Please see P.3.6 for further information about our use of cookies.

We also collect data about your primary registered device, including device identifiers and operating system information, as part of our device authentication process described in our Terms.

We may monitor and record your emails, in-app messages, calls and other communications for regulatory compliance, crime prevention and internal improvement purposes, and where we need a record of what has been said.

P.2.3 — Publicly available sources

We may collect personal data about you from publicly available sources, including Companies House, public registers and other publicly available databases, for the purposes of identity verification, fraud prevention and anti-financial crime checks.

We may also receive personal data about you from fraud prevention agencies and other third parties as part of our legal and regulatory compliance obligations.

P.3 — How We Use Your Personal Data

P.3.1 — Legal basis

We will only use your personal data where we have a lawful basis to do so. The lawful bases we rely on are:

Performance of a contract with you — where processing is necessary to provide your TallyMoney Account and the services described in our Terms including opening an account, processing your instructions and making payments.

Legal obligation — where processing is necessary to comply with our legal and regulatory obligations, including anti-money laundering, counter-terrorist financing, identity verification and on-going monitoring requirements.

Legitimate interests — where processing is necessary for our legitimate business interests, provided those interests are not overridden by your rights and interests. Our legitimate interests include fraud prevention, security, improving our services and communicating with you.

Consent — where you have given us your explicit consent to process your data for a specific purpose, such as disclosing your information to third parties, processing any Special Category Data and direct marketing communications. You may withdraw your consent at any time by contacting us — see P.9.1.

Vital interests — in exceptional circumstances, where processing is necessary to protect your vital interests or those of another person.

P.3.2 — Purposes for which we use your personal data

We use your personal data for the following purposes:

- to register you as a TallyMoney customer and verify your identity
- to provide and manage your TallyMoney Account and the services described in our Terms

- to process transactions on your TallyMoney Account, including gold purchases, sales, transfers and card payments
- to conduct ongoing anti-money laundering, counter-terrorist financing and compliance checks
- to detect, investigate and prevent fraud, security breaches and other prohibited activities
- to manage our relationship with you, including notifying you of changes to our Terms or this policy
- to administer and protect the TallyMoney Platform, including troubleshooting, data analysis and system maintenance
- to deliver relevant content and communications to you via the TallyMoney App
- to measure and analyse how customers use the TallyMoney App to improve our services
- to comply with our legal and regulatory obligations
- to send you marketing communications where you have consented or where we have a legitimate interest to do so

P.3.3 — Direct marketing

We may use your Identity Data, Contact Data and Usage Data to send you information about products, services, promotions and offers that we think may be of interest to you. We will only do this where:

- you have given your explicit consent to receive such communications; or
- we have a legitimate interest in doing so and you have not opted out.

You can opt out of direct marketing at any time by contacting us — see P.9.1 — or by using the unsubscribe link in any marketing email.

P.3.4 — Third-party marketing, remarketing and lookalike audiences

We may use your personal data to deliver targeted advertising and marketing through third-party platforms, including social media and digital advertising networks. This may include:

Remarketing — where we use cookies and device identifiers to show TallyMoney advertisements to you when you visit other websites or use other apps, based on your previous interactions with the TallyMoney App or Website.

Lookalike audiences — where we share hashed or encrypted data (such as email addresses) with third-party advertising platforms to identify and reach new audiences with similar characteristics to our existing customers. No identifiable personal data is shared directly with third parties for this purpose — only encrypted or hashed identifiers are used.

We only use third-party platforms that provide adequate data protection safeguards and process data in accordance with applicable data protection law. You can opt out of interest-based advertising at any time — see P.3.5.

P.3.5 — Opting out of marketing

You have the right to opt out of marketing communications and interest-based advertising at any time. You can do this by:

- contacting us — see P.9.1
- using the unsubscribe link in any marketing email
- adjusting your preferences in the TallyMoney App
- opting out of SMS communications by following the instructions in any SMS message we send you
- adjusting your advertising preferences in your device settings or through the relevant third-party platform

Please note that opting out of marketing does not affect our right to send you service-related communications that are necessary for the operation of your TallyMoney Account.

P.3.6 — Cookies

We use cookies and similar tracking technologies on the TallyMoney Website and TallyMoney App to:

- ensure the Website and App function correctly
- remember your preferences and settings
- analyse how you use our services and improve them
- deliver relevant advertising and measure its effectiveness

Types of cookies we use:

Strictly necessary cookies — essential for the Website and App to function. These cannot be disabled.

Performance cookies — collect information about how you use our Website and App, such as which pages you visit most often. This data is aggregated and anonymous.

Functional cookies — remember your preferences and personalise your experience.

Targeting and advertising cookies — used to deliver relevant advertising and track the effectiveness of our marketing campaigns. These may be set by us or by third-party advertising partners.

You can manage your cookie preferences at any time through your browser settings or via our cookie consent tool. Non-essential cookies are only used with your consent. Please note that disabling certain cookies may affect the functionality of the TallyMoney Website or App.

P.4 — Sharing Your Personal Data

P.4.1 — Who we share with

We may share your personal data with the following categories of recipients:

TallyMoney group companies — other companies within the TallyMoney group that support the provision of services to you.

TallyMoney Partners — service providers who assist us in providing the TallyMoney Platform, including gold custodians, vaulting service providers, LBMA-accredited precious metals brokers and insurance providers. These partners process data on our behalf as data processors.

Identity verification and fraud prevention agencies — organisations that help us verify your identity and prevent fraud and money laundering, including credit reference agencies and fraud prevention databases.

Regulatory and governmental authorities — where we are legally required to share your data, including with HMRC, law enforcement agencies and financial regulators.

Professional advisers — including lawyers, auditors and accountants, where necessary for the operation of our business.

Technology and cloud service providers — who provide infrastructure, software and other technical services that support the TallyMoney Platform.

Marketing and analytics partners — where you have consented to marketing or where we have a legitimate interest, including advertising platforms used for remarketing and lookalike audiences as described in P.3.4.

Business transfers — in the event of a merger, acquisition, reorganisation or sale of all or part of TML's business or assets, your personal data may be transferred to the relevant third party. We will notify you if this occurs and ensure your data continues to be protected in accordance with this policy.

We do not sell your personal data to third parties.

P.4.2 — Our requirements of third parties

All third parties with whom we share your personal data are required to process it in accordance with applicable data protection law. Where third parties act as data processors on our behalf, we require them to have appropriate technical and organisational security measures in place and to process your data only on our documented instructions.

P.5 — International Data Transfers

P.5.1 — Safeguards we apply

The TallyMoney Platform is operated by TML in the United Kingdom. However, some of our service providers and TallyMoney Partners may be based in or process data outside the UK, including in countries that may not provide the same level of data protection as the UK.

Where we transfer personal data outside the UK, we ensure appropriate safeguards are in place, including:

- transferring to countries with an adequacy decision from the UK Secretary of State, including Guernsey (which has UK adequacy status) and the United States of America following the adoption of the UK-US Data Bridge on 12 October 2023
- using UK International Data Transfer Agreements or other appropriate transfer mechanisms
- ensuring our service providers have adequate contractual protections in place

You can request further information on these safeguards by contacting us — see P.9.1.

Physical gold held on your behalf in Switzerland does not involve a transfer of your personal data — only operational data relating to the gold itself is held by the custodian.

P.6 — How We Protect Your Data

P.6.1 — Security measures

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures to protect it against unauthorised access, loss, destruction or alteration. These measures include:

- encryption of data in transit and at rest
- primary device registration and authentication as described in our Terms
- liveness and likeness verification for account access and device registration
- regular security assessments and penetration testing

- access controls limiting who within TML can access your personal data
- location-independent cloud backup of all databases

P.6.2 — Data breach procedures

In the event of a suspected personal data breach, TML has procedures in place to respond promptly. Where a breach is likely to result in a risk to your rights and freedoms, we will notify the Information Commissioner's Office ("ICO") within 72 hours of becoming aware of it, where required by law. Where a breach is likely to result in a high risk to your rights and freedoms, we will also notify you directly without undue delay.

P.7 — How Long We Keep Your Data

P.7.1 — Retention principles

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including satisfying any legal, regulatory, accounting or reporting requirements.

To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, and whether we can achieve those purposes through other means.

P.7.2 — Minimum retention periods

We will retain your personal data for a minimum of seven years following the closure of your TallyMoney Account, in accordance with our legal and regulatory obligations, including under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as set out in our Terms. Some categories of data may be retained for longer where required by applicable law.

P.7.3 — Anonymisation

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use that anonymised data without further notice to you.

P.8 — Your Rights

P.8.1 — Summary of your rights

Under UK data protection law, you have the following rights in relation to your personal data:

Right of access — to request a copy of the personal data we hold about you.

Right to rectification — to request that we correct inaccurate or incomplete personal data.

Right to erasure — to request that we delete your personal data where there is no good reason for us to continue processing it. Note that this right may be limited where we have legal obligations to retain your data.

Right to restrict processing — to request that we suspend processing of your personal data in certain circumstances.

Right to data portability — to request that we transfer your personal data to you or a third party in a structured, commonly used machine-readable format.

Right to object — to object to processing of your personal data where we rely on legitimate interests as our lawful basis, or where we process your data for direct marketing purposes.

Right to withdraw consent — where we rely on consent as our lawful basis, to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

Right not to be subject to automated decision-making — not to be subject to decisions based solely on automated processing that produce legal or similarly significant effects. We use automated decision making in certain parts of our customer journey, for example when determining if we are able to offer you an account. You have the right to request human review of any automated decision that significantly affects you. To exercise this right, contact us — see P.9.1.

P.8.2 — No fee usually required

You will not usually have to pay a fee to exercise any of your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or we may refuse to comply with your request in these circumstances.

P.8.3 — What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

P.8.4 — Time limit to respond

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

P.9 — Contact Us and Complaints

P.9.1 — Contact details

If you have any questions about this Privacy Policy or wish to exercise any of your rights, please contact our Data Protection Officer:

Email: dpo@tallymoney.com **Post:** TallyMoney UK Ltd, Northwest House, 119 Marylebone Road, London NW1 5PU

For general account support, please contact us at:

Email: support@tallymoney.com **Phone:** 0203 858 0373

P.9.2 — Complaints

If you believe we have not handled your personal information responsibly you should first complain to us with full details of your concerns. If you are unhappy with our response, or we have not responded within a reasonable time (at least one month) you have the right to make a complaint to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues.

The ICO can be contacted at:

Website: www.ico.org.uk

Phone: 0303 123 1113

P.10 — Changes to This Policy

P.10.1 — How we notify you of changes

We may update this Privacy Policy from time to time to reflect changes in our practices, technology or legal requirements. Any changes will be communicated to you via the TallyMoney App and/or by email. We encourage you to review this policy periodically.

P.10.2 — Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please notify us without delay if your personal data changes during your relationship with us — see P.9.1.

P.11 — Third-Party Websites

The TallyMoney App and Website may contain links to third-party websites, applications or services. Clicking on those links may allow third parties to collect or share data about you. We do not control those third-party websites and are not responsible for their privacy policies. We encourage you to read the privacy policy of every website or service you visit.