



TALLYMONEY LTD CUSTOMER PRIVACY POLICY

Tally is committed to protecting your privacy. This Privacy Policy sets out the details of the information that we may collect from you and how we may use that information when you use any of our products and services, our app and our Website. Please take your time to read this Privacy Policy carefully. This Privacy Policy should be read alongside, and in addition to all product and service specific terms and conditions.

1. About us

In this Privacy Policy references to “us”, “our”, “we”, or “Tally” are to TallyMoney Ltd.

TallyMoney Ltd is a company registered in England and Wales (company registration number 07089561) with its registered office address at Salisbury House, London Wall, London EC2M 5QQ. TallyMoney Ltd is an Electronic Money Directive Agent (Financial Conduct Authority Reference Number 902059) under the Financial Conduct Authority-licensed E-Money Institution, PayrNet Limited (Financial Conduct Authority Reg. No. 900594).

Tally acts as data controller in respect of your personal information that we process.

If you have any questions about how we collect, store or use your information, please contact us at support@tallymoney.com.

2. What personal information do we collect and use and who do we collect it from?

We will collect personal information like your name, address and date of birth when you apply for, or use any of our products or services. We will also collect data from your use of our website and app. The type of information that we collect from you will depend on your relationship with us:

Information requested from you when you make an application for one of our products or services (including, but not limited to name, postal address, telephone number, email address, date of birth) or at any time about your personal and financial circumstances or which we gather about you from the way you use and manage any account which we open for you.



Details of any transactions (including any purchases of goods or services and other payments to and from your account) such as the amount, date and currency of a purchase and the supplier category (such as petrol station, supermarket or medical services).

We will keep details and records of when you contact us and we contact you, like calls, emails, text messages, social media messages or other communications.

User interactions and log data when you use our website(s) and app and click on our adverts on other websites (see information on cookies on our website)

Mobile device specific data.

Information we receive about you from third parties, such as credit reference or fraud protection agencies.

Information that is publicly available.

Information from social media sites.

Please note that your external security details will be stored on a third party secure server and not on your mobile phone. Your external security details will be encrypted when stored and encrypted when data is transmitted – we will never see or have access to your external security details.

3. How do we collect your information

We collect information from you:

when you apply for our products and services via our websites or our app

when you talk to us on the phone, over email, by letter, via chat or social media

when you make transactions using our products and services

when you connect to our products and services using devices, such as computers and mobile phones, using cookies and other internet tracking software

4. What are the purposes for which your personal information is used

Data protection law says that we are allowed to use personal information only if we have a proper reason to do so. We'll process your personal data on the following legal basis and for the following purposes:



As necessary to perform our contract with you for the relevant account, product or service:

To take steps at your request before entering into the contract;

To manage and perform that contract;

To complete a supplier switch that you have requested;

To keep our records up to date;

To trace your whereabouts to contact you about your account and recovering money that is owed to us; and

To analyse your balances and transactions of your linked accounts to identify opportunities to save.

As necessary for our own legitimate interests, that is when we have a business or commercial reason to use your information, for example:

For good governance, accounting and managing and auditing our business operations;

To keep our records up to date;

Working out which of our products and services may be of interest to you;

To monitor emails, calls other communications and activities on your account;

For market research, analysis and developing statistics; and

To send you marketing communications (including automated decision making relating to this), which may include but is not limited to us sending you a Monthly Newsletter as well as exclusive offers and updates.

As necessary to comply with a legal obligation, for example:

To comply with our legal and regulatory requirements and related disclosures;

To establish and defend our legal rights;

For activities relating to the prevention, detection and investigation of crime;

To verify your identity, make credit, fraud prevention and anti-money laundering checks;

To monitor emails, calls and other communications and activities on your account.



Based on your consent, for example:

When we process any special categories of personal data about you at your request (e.g. information concerning your health);

To send you marketing communications where we've asked for your consent to do so. You're free to withdraw your consent at any time, however this will mean that we will not be able to do certain things for you.

5. How will your personal information be used?

We will use the personal information we hold about you, and data from the technology/devices you use to access your account(s) to:

Provide, manage and develop our products and services

Understand your preferences and advise you about our other products and services

Undertake market research, transactional analysis, statistical analysis and system testing

Update our records

Recover debt

Confirm your location

Prevent and investigate fraud, money laundering and other crimes

If we believe that you have tax obligations in another country, we may disclose personal information of yours with those tax authorities, or with HM Revenue and Customs, who may share the information with the other tax authorities.

We may search, use and share the records held by domestic and international credit reference agencies and fraud prevention agencies, as well as our own internal records to:

Confirm your identity and prevent fraud or money laundering

Check your credit history and income details for affordability

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.



6. Who do we share your information with?

We disclose your information to the third parties listed below for the purposes described in this Privacy Policy. You can contact us for details of specific disclosures made in respect of your information:

Third parties acting on our behalf, including our service providers and agents who help us manage your products and services, for example our payment, aggregation and other partners;

Credit referencing agencies to check your credit rating;

Know your Customer (KYC) and cyber security providers;

Relevant government bodies, authorities and regulatory bodies in order to comply with our regulatory and reporting obligations;

IT providers/hosted IT solution providers to enable us to provide our products and services to you;

Debt collection agencies in the event we need to collect arrears from you;

Other service providers via a shared, secured database for income verification and affordability checks and to manage/collect arrears;

Our professional advisors (lawyers, accountants and consultants);

Any other parties connected with your account e.g. guarantors and joint account holders;

Market research companies to assist us in improving our product or service delivery;

Any third party who is restructuring, selling or acquiring our assets, as long as that party uses the personal information in accordance with the terms of any agreements between you and us;

If you have cards linked to your account, we'll share transaction details with MasterCard, who provide our cards. They may transfer this information overseas to deal with transactions, resolve disputes and/or for statistical purposes.

Anyone else where we have your consent or where it is required by law.

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If



fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found in our privacy policy. A list of TallyPartners can be found here.

We will make sure that anyone acting on our behalf only uses your personal information in line with our instructions and that they keep the data safe.

We won't share or give your personal information to external companies for their own marketing purposes.

7. What marketing activities do we carry out?

We may also use your personal information to provide you with information about products or services which may be of interest to you where you have provided your consent for us to do so.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from emails sent by us, you may do so at any time by clicking on the "unsubscribe" link that appears in all emails. Otherwise you can always contact us at support@tallymoney.com to update your contact preferences.

8. Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which cannot be used to identify you, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

9. How long do we keep personal information for?

We only keep personal information for as long as reasonably necessary to fulfil the relevant purposes described in this Privacy Policy and in order to comply with our legal and regulatory obligations.

After you stop being a customer, we may keep your data for up to 7 years for one of these reasons:

To maintain records according to laws and regulations that apply to us



To show that we treated you fairly

To respond to any questions or complaints

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

Please note that fraud prevention agencies are permitted to hold your personal data for different periods of time and if you are considered to pose a fraud or money laundering risk your data can be held for up to six years.

10. What is our approach to international data transfers

Some of our suppliers who process your data in accordance with this Privacy Policy may be outside the UK and the European Economic Area ("EEA"). When they do, we will have a contract in place to make sure the recipient protects the data to the same standard as is required in the EEA.

Similar safeguards are applied by fraud prevention agencies where they have had access to your data in accordance with this privacy policy, where they transfer your personal data outside of the EEA.

11. Your rights under applicable data protection law

You have certain rights under applicable data protection law, these rights are:

The right to be informed about our processing of your personal data

The right to request access to your personal data and information about how we process it

The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed (the "right to rectification")

The right to have your personal data deleted (the "right to be forgotten")

The right to restrict processing of your personal data

The right to move, copy or transfer your personal data ("data portability")

The right to object to the processing of your personal data



Rights in relation to automated decision making including profiling

You can find out more information about your rights at the Information Commissioner's website:

www.ico.org.uk

If you choose not to give us the personal information that we request either during an application process or during the life of an account or product, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform the services needed to manage your accounts/provide your chosen products and services. It could mean that we have to cancel a product or service you have with us.

Please let us know if you are unhappy with how we have used your personal information. You can contact us at support@tallymoney.com. You also have the right to complain to the Information Commissioner's Office who can investigate our compliance with data protection law. Find out how at www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

12. Keeping your information up to date

We will use reasonable endeavours to ensure that your personal information is accurate. In order to assist us with this, please notify us of any changes to the personal information that you have provided to us by updating your details on the Tally App or by contacting us at support@tallymoney.com.

13. Further information

We are required to employ adequate technical and organisational security measures to protect your personal information from any loss, destruction, damage or unlawful disclosure. However, please remember that no transmission over the Tally App or the Tally Website can ever be guaranteed as secure. Consequently, please note that we cannot guarantee the security of any personal information (including external security details) which you transfer via the Tally App or the Tally Websites.

14. Updates to this Privacy Policy

We may update this Privacy Policy from time to time to ensure that it remains accurate. Please check back each time you provide additional personal information to us.

Partners



User data, especially personally identifiable information like name, phone, email, etc., is not shared with third parties beyond mandated compliance requirements.

Railsbank

Privacy Policy - <https://www.railsbank.com/privacypolicy>

Mastercard

Cardholder Terms - <https://www.tallymoney.com/legal/mastercard-cardholder-terms>

Stripe

Privacy Policy - <https://stripe.com/gb/privacy>