

PURE + SOLID®

Privacy Policy

This Privacy Policy ("Policy") together with the Cookies Policy, Website Terms of Use (as applicable) and Cardholder Terms and Conditions apply to its users ("you") for the use of the website pureandsolid.com ("Site") and any of the services offered to you via the Member LogIn Portal at login.pureandsolid.com ("Services").

The purpose of this Policy is to describe how Pure and Solid® Limited ("Pure + Solid", "we", "us" and/or "our") collects, stores and uses personal information ("Personal Information") from you, or how Personal Information that you provide to us, will be processed and used by us.

The Personal Information you give us may include your name, address, gender, title, date of birth, e-mail address, mobile phone number, username, password, financial details of your bank account including the bank account number, bank sort code and IBAN, details of your Pure + Solid card including the long number, relevant expiry dates and CVC, identification document numbers, copies of identification documents (for example, passport, driving license and utility bill) and photographs and any other Personal Information you provide to us for receiving and/or using our Services.

When you deal with us we will assume you agree to the uses of your Personal Information described in this Policy unless you tell us otherwise in writing to Pure and Solid Limited, 3rd Floor, 14 Hanover Street, W1S 1YH, London, United Kingdom or email us at info(at)pureandsolid.com.

We may decide in the future to change this Policy, if so, we undertake to reflect this in the Policy of this Site and any other part of this Site we deem appropriate. We reserve the right to modify this Policy at any time, please review it frequently.

1. COMPLAINTS

If you would like to make a complaint or contact us for any other reason connected to this Policy please write us to the above-mentioned address or call us on +44 (0) 20 731 706 84. We have procedures in place to make sure that we handle your complaint fairly and quickly. However, if you are not satisfied with the outcome of your complaint, you can write to the UK supervisory authority for data protection issues (www.ico.org.uk).

2. DATA CONTROLLER

We act as the data controller of your Personal Information. We are registered with the Information Commissioner's Office (ICO), reference number ZA138381.

3. HOW IMPORTANT YOUR PERSONAL INFORMATION IS TO US AND HOW WE PROTECT IT

We understand that privacy is a concern of our users and we take care of any Personal Information gathered through our Site and our Services. In order to secure and maintain the security of your Personal Information we use sophisticated security techniques, which we believe to be appropriate technical and organisational security measures to protect against unauthorised or unlawful use, fraud or suspicious activity, accidental loss, damage or destruction. We have strict confidentiality agreements with our third-party service providers in place.

4. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

From initial contact through to providing you with our Services or working together in other ways, we may collect Personal Information about you. We may collect and process the following data about you:

A) Personal Information you give us ("Submitted Information"):

- Information that you provide by filling in contact, order or application forms on our Site. This includes information provided at the time of registering to use our Site, subscribing to our Services, posting material or requesting further Services;

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- For authenticating you we may also ask you to provide us with official governmental issued documents and/or utility bills, such as a bank statement;
- Details about any matter on which you choose to engage us, as well as your bank account and/or other payment details for the purpose of paying our charges;
- Details of your visits to our site including the resources that you access;
- Details of transactions you carry out through our Site or via the use of our Services and for the fulfilment of your transaction requests, including date, time, amount, currency, Mastercard exchange rate, transaction text, transaction identifier, beneficiary details, merchant or ATM location, merchant category code and other transaction specific details provided by card or bank scheme network;
- If you contact us, we may keep a record of that correspondence.

B) Personal Information you give us ("Location and Device Information"):

- Information for our internet access logs, such as but not limited to internet protocol (IP) addresses, browser types, internet service providers (ISP), referring/exit pages, operating systems used, date/time stamps, and click stream data.

5. HOW WE USE YOUR PERSONAL INFORMATION

We may collect, store and use your Personal Information, the ways we do so necessarily depend on the relationship you have with us.

A) Submitted Information, we will use for:

- Delivering, maintaining and optimising our Services for and to you;
- Corresponding and contracting with you;
- Verifying your identity and to protect against fraud, comply with financial crime and anti-money-laundering laws, rules and regulations;
- Opening, administering and running customer prepaid cards, including the use of your mobile phone numbers and Email addresses for the purpose of delivering our Service to you, and dealing with any customer enquiries;
- Administering and running different top-up/pay-in methods, including the use unique top-up/pay-in identifier to best track your card loadings;
- Charging agreed payment instructions to you and collecting our fees and charges; and
- Sending you information and publications that we may circulate from time to time and news about the Services that we provide. We will not send you marketing communications where you have told us you do not wish to receive these.

B) Location and Device Information, we will use for:

- Administering our Site and to improve it and display it in the most effective manner for you and your device;
- Troubleshooting, data analysis, testing, research, statistical and survey purposes;
- Tracking usage of our Site for the purpose of identifying Site usage analytics and trends. Gathered information is processed only in an anonymous, aggregated form, and will only be used for analytics purposes as described in our Cookies Policy;
- Tracking usage of our Site for the purposes of fraud detection or protection, or in other situations involving suspicious or illegal activities; and
- Complying with our legal and regulatory obligations.

6. DISCLOSURE OF YOUR INFORMATION

The use of your Personal Information may include passing them on to third-parties, if reasonably required and only to deliver our Services to you. They use data securely and confidentially and under strict contractual controls in accordance with data protection regulations.

We send Personal Information to the following data processors to perform our Services:

- *Credit-checking/reference agencies and fraud prevention agencies* – in order to verify your identity, perform transactions you instruct on us or for the purposes of fraud detection or protection, or in other situations involving suspicious or illegal

activities. We may as well perform a search of your credit file, if this is necessary and/or required to deliver our Services to you;

- *Banking, including Electronic Money Institutes, and financial service partners such as banking intermediaries, international payments services providers and regulated distribution agents* – in order to perform our Services;
- *Law enforcement agencies* – but only if reasonably required;
- *Cloud storage providers* – to safely and securely store your Personal Information;
- *Card scheme network provider and transaction processing partners involved in processing the transactions and/or supplying services associated with our Services* – to deliver our Service to you;
- *Card manufacturing/personalisation and delivery companies* – in order to produce your prepaid card(s) and to deliver it to you either by air mail, courier or personally;
- *Analytics providers* – in order to perform Site troubleshooting, data analysis, testing, research, usage tracking and for the purposes of fraud detection or protection, or in other situations involving suspicious or illegal activities;
- *Mobile network and email service providers* – in order to perform our Services, in particular Personal Identification Number (PIN) and email notification distribution;
- *Regulatory or governmental body or authority* – in case we are under a duty to disclose or share your Personal Information in order to comply with any legal or regulatory obligation or request: and
- *Potential seller or buyer or investor or shareholder* – in case that we sell or buy any business or assets.

When you provide us Personal Information about someone else we will assume they have consented, although we may still ask you for confirmation.

7. TRANSFERS OF PERSONAL INFORMATION OUTSIDE THE EEA

We store your Personal Information inside the European Economic Area ("EEA"). As we provide an international service we may from time to time need to transfer your Personal Information outside of the European Economic Area ("EEA"), to contracted partners and service providers. For example we may receive and/or provide your prepaid card and associated transactional details and services from centres such as the USA, Dubai and India and we may process payments through other organisations such as banks, payment processors, card networks and payment schemes. In applying for our Services you explicitly consent to this.

8. STORAGE OF PERSONAL INFORMATION

Your Personal Information is stored on our secure servers. Transaction data, transaction details and payment processing details are securely stored using a Payment Card Industry Standards ("PCI") certified environment.

Any password you have chosen must be kept confidential and must not be shared with anyone.

Data transmission via the internet is not always secure and not in our sphere of influence. Although we will do our best to protect your Personal Information, we sadly cannot guarantee the security of your Personal Information transmitted on our Site. Kindly note that any such transmission is at your own risk.

9. RETAINING YOUR PERSONAL INFORMATION

In light of rules, regulations and applicable laws for the provision of our Services, especially the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (SI 2017/692) and the E-Money Regulations 2011, we will keep your Personal Information for no longer than 6 years after termination of our relationship with you.

10. COOKIES

We may use cookies, web beacons and other monitoring technologies to compile anonymous statistics, to track user journeys and monitor Site usage – if we do so we will let you know explicitly. Cookies are data files stored on your computer that identify you as a unique user. In some instances, we may allow third-parties to monitor our Sites for

the purpose of reporting user traffic, statistics, advertisements, “click-throughs” and/or other activities and to set their cookies on your computer, subject to agreement between such third-party and us. Most browsers allow the user to restrict cookies; doing so will not impair your use of this Site in any way. Please read our Cookies Policy carefully.

11. LINKS TO OTHER SITES

This Site contains links to other websites, unaffiliated third-party websites. We cannot control or be held responsible or liable for the content or privacy practices of such sites since we do not control them. Please always carefully review the content and privacy policy of any third-party website that you may visit in order to understand how they may collect, store and use your personal data.

12. YOUR RIGHTS

The data protection laws grant you the following rights:

- *Request access to your Personal Information* – You can receive a copy of the Personal Information we hold about you. If you require this, kindly email us at [info\(at\)pureandsolid.com](mailto:info@pureandsolid.com)
- *Request correction of the Personal Information that we hold about you* – You can have incomplete or inaccurate data we hold about you corrected. If you require this, kindly email us at [info\(at\)pureandsolid.com](mailto:info@pureandsolid.com)
- *Request erasure of your Personal Information* – You can ask us to delete or remove Personal Information where it is not reasonable for us continuing to process it. You can ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see next point). Kindly note that we are under certain obligations to retain Personal Information for a minimum period of 6 years, any retention requirements supersede any right to erasure requests under applicable data protection laws. If you require this, kindly email us at [info\(at\)pureandsolid.com](mailto:info@pureandsolid.com)
- *Object to processing or request restriction of processing of your Personal Information* – You can object to processing of your Personal Information or ask us to restrict the processing as you e.g. feel it impacts on your rights or freedoms. Kindly note that we are under certain obligations to process Personal Information, these requirements supersede any right to erasure requests under applicable data protection laws. In case you object to processing of certain data we may not be able to provide our Services to you what might leave us no option as to have your contract with us terminated. If you require this, kindly email us at [info\(at\)pureandsolid.com](mailto:info@pureandsolid.com)
- *Request the transfer of your Personal Information to you* – We can provide you your Personal Information electronically. You can then, if required, transfer your Personal Information to any third-party. This right only applies to Personal Information which you initially provided to us to perform our Services. If you require this, kindly email us at [info\(at\)pureandsolid.com](mailto:info@pureandsolid.com)

13. WITHDRAWAL OF CONSENT

Whenever you withdraw your consent to the usage of your Personal Information we are relying on to perform our Services, we may not be able to continue to provide our Service to you and subsequently may have to terminate the contract we hold with you.

14. ACCESS TO PERSONAL INFORMATION

Kindly note that we may have to confirm your identity to make sure you have the right to access your Personal Information.

We aim to respond to legitimate requests to access Personal Information within 3 weeks. We will inform you in case it takes longer to answer your legitimate request.

We will not charge a fee to access your Personal Information. We might charge a fee or decline your request to access your Personal Information in case your request is clearly unreasonable, unfounded, repetitive, excessive or malicious.