



Privacy Policy

Our policy on collection, use and security of information.

1. Background

- 1.1.** Konect is a trading name of Konect Financial Limited. Whenever we say “we” in this Privacy Policy, we mean Konect (or another of our group companies). Our registered office address is 3rd Floor, 86-90 Paul Street, London, England, EC2A 4NE and our company number is 15665787.
- 1.2.** We consider the fair and lawful treatment of personal data as a critical factor in the success of our operations and key to maintaining the confidence between us and our communities. We, therefore, acknowledge our legal obligations under the General Data Protection Regulation (GDPR) and endorse its requirements.
- 1.3.** It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing your personal data, so that you are fully aware of how and why we are using it.
- 1.4.** When you visit our website or use any of our applications; or provide information to us via our website, or any of our applications, you are accepting and consenting to our processing of your information in accordance with this Privacy Policy, our Cookie Policy, our Website Terms and Conditions and any other contract we may have with you including, without limitation, our Terms and Conditions.
- 1.5.** From time to time, we may develop new or offer additional services, so we may update this Privacy Policy accordingly. We recommend that you download or print a copy of this Privacy Policy and store it for your records and future reference.

2. Getting in touch with us

The personal data we hold about you needs to be accurate and current. Where you provide any personal data directly to us, please keep us informed if this information changes during your relationship with us.

You can get in touch with us at customercare@konect.global

If you have any questions about this Privacy Policy or how we handle privacy, please contact us at customercare@konect.global

3. Information we hold about you

- 3.1.** In accordance with the applicable laws and regulations, we only collect and process a limited amount of data, including personal information about you that is necessary to perform our business operations and provide you with our products and services. Personal data as used in the context of this Privacy Policy, applies to any information that identifies or that can be used to identify you as a private individual, this includes personal and financial information about you that we collect, use, share and store. This may include your name, date of birth, address, contact information, financial information, details about your health and lifestyle, employment details and device identifiers including internet protocol (IP) address. It may include information about any other Konect products and services (or products and services provided by our partners) you currently have, you have applied for or you have used in the past.



- 3.2.** We may also require other identification information if you send or receive certain high-value transactions or high overall payment volumes through our services or as is otherwise required in order for us to comply with financial crime prevention obligations under the respectively applicable regulatory requirements.
- 3.3.** Under data protection laws, we are known as the data controller of your personal data and this Privacy Policy relates only to our activities as a data controller. We are a data controller whenever we decide how, why, and by what means personal data is to be processed. Personal data means any information about you that could be used to help identify you. In this Privacy Policy we use 'personal data' and 'information' interchangeably.

4. What information do we collect from you?

We collect, use, share, record and store information about you to provide you with the services you have asked us for and to share information with you about services that may be of interest to you, to improve our customer service to you by analysis key customer trends and topics. We use a variety of channels to do so, including via our team of payment consultants.

You may provide this information direct to us, for example by the way you communicate or do business with us, such as:

- applying for products or services;
- using our telephone services, websites or mobile applications;
- writing to or calling us;
- downloading any of our mobile applications or using our websites or digital services, in which case we may gather information about how you access and use these services, such as your IP address and information about the devices or software you use (we may also make other requests or give you more details about how we use your information, for example, we may ask for your location to help find nearby services);
- using and managing your accounts, (we may take information such as the date, amount and currency of payments made to your account); and
- giving information to us at any other time, including calls and through social media.

If you do not provide the information that we request, this may mean that we are unable to properly provide our products and services and/or carry out all our obligations under our contractual agreements with you.

Checking your identity

If you are a new or existing business customer, we and our service provider(s) will need to confirm your identity as part of the KYB/KYC review process. We will ask you to provide documents, and may also collect information from third parties, such as commercial registers, for this purpose.

5. How do we use your information?

- 5.1.** We collect, store and process your personal data as described hereunder, primarily to provide you with a safe, smooth, efficient, and customised experience, specifically, for the following business-related purposes:



- a. Account setup and administration. Your personal data is required to set up and manage your account, authenticate your access to an account, communicate with you about your account, provide technical and customer support, verify your identity, send important account, transaction and service information.
 - b. Provision of products and services. We use your personal data for identification and verification purposes, i.e. to confirm your identity and conduct the appropriate due diligence checks.
 - c. Contractual obligations. We need your personal data to fulfil our obligations arising from any formed contracts between you and us.
 - d. For our legitimate interests. We may use your personal data to manage our business needs, such as monitoring, analysing, and improving the services, the website's performance and functionality, and to enforce the terms under which we provide our services.
 - e. Surveys and polls. If you participate in a survey or a poll, the information you provide to us may be used for market and historical research purposes.
 - f. Email alerts. Where you have explicitly consented, we use your personal data to provide you with information about our products and services, to inform you about important changes to this Privacy Policy or other relevant business news.
 - g. Job applications. If you wish to apply for an advertised vacancy, we need your personal data in order to administer the recruitment process.
 - h. Legal obligations. We may be required to collect and retain personal data about you for legal and compliance reasons, i.e. to manage risk, or to detect, prevent, and/ or remediate fraud or other potentially illegal or prohibited activities.
- 5.2.** In alignment with our commitment to protect your personal data, we only conduct such processing where there is a valid lawful basis. In particular, we use your personal data in line with our contractual and/ or legal obligation, or when we have a legitimate interest. Where our reason for processing is based on your consent, you may withdraw that consent at any time.
- 5.3.** We also use your information: to help us develop new and improved products and services; to meet your and our other customers' needs; to improve our customer service capabilities and enhance your customer experience; to analyse common issues and topics raised by customers; for training; for record-keeping; to meet the contractual obligations with service providers, by law and under any regulations that apply; to keep you informed about products and services you hold with us and to send you information about products or services (including those of other companies where you have consented for us to do so) which may be of interest to you.

6. What is the legal basis for using your information?

We must have a legal basis (a valid legal reason) for using your personal data. Our legal basis will be one of the following outlined below.

Adhering to our contracts and agreements with you

We need certain personal data to provide our services and cannot provide them without this information.



Legal or Regulatory obligations

In some cases both now and in the future, we may have a legal responsibility to collect and store your personal data.

Legitimate interests

We sometimes collect and use your personal data, or share it with other organisations, because we or they have a legitimate reason to have it and this is reasonable when balanced against your right to privacy.

Consent

Where you've agreed to us collecting your information, for example where completing an application form or by using the customer portal we provide, or when you have ticked a box to indicate you are happy for us to use your personal data in a certain way.

7. Information we collect from you and the legal bases for doing so

Customers

For the purposes of data protection and for clarity, in addition to all other legal entity categories we consider a sole trader or individual and who registers for and/or uses any of our business-to-business services or buys products from us, (such as a hardware or accessories) to be a Customer.

The personal data we collect from Customers includes:

Category

Examples

Account identification information

Unique Customer Identifier, Merchant ID number, passwords and equivalent account security information

Contact details

Name, address, phone numbers, email

Financial information

Bank details, transaction history, credit history and credit score, information relevant to invoices issued by us to a customer.

Information required to be obtained and kept by law

Information required for customer identification and verification (e.g. government issued IDs)



Category

Examples

Technical and behavioural tracking data

IP address, location data, pages viewed on our website or applications, whether email communications (including embedded links within them) are opened, cookie identifiers, the types of devices you are using to access or connect to our applications, unique device IDs, device attributes, network connection type and provider, network and device performance, browser type, operating system, and application version

The purpose and legal basis for processing the personal data outlined above will be:

Purpose

Legal Basis

To administer any account or registration you may have with us.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

To carry out our obligations arising from any contracts entered into between you and us.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

To provide you with the products and services that you request from us.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

To administer your participation in any competitions or prize draws we may run from time to time.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

To provide you with our newsletter, if you have subscribed to receive it, and any other information that you request from us from time to time.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests



Purpose

To communicate with you (via the use of surveys or by other means) about any comments, queries, or feedback you might have about us, our website or our applications.

For publication on our website (for example, in connection with your listing or advertisement or for review or testimonial purposes), but only if you have either provided it to us for that purpose or if you have consented to this.

To enable you to participate in interactive features of our website or our applications, when you choose to do so.

To ensure that content on our website or in our applications is presented in the most effective manner for you and for your computer.

To provide you with information about the products and services we feel you may be interested in, by post, telephone, Text or multimedia message, email or via in-application notifications.

To administer our site and applications and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

To keep our website or our applications safe and secure.

Legal Basis

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- Where legally required to obtain your consent to provide this information, we will obtain your consent. If consent is not required, we will provide you an option to opt-out

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests



Purpose

To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

To make suggestions and recommendations to you and other users of our website / applications about goods or services that may interest you or them.

To verify your identity as well as your personal and contact information.

To record and prove that transactions have been executed.

To initiate, exercise and defend any legal claim or collection procedure.

To comply with internal compliance procedures.

To prevent misuse of our services.

To carry out risk management and fraud prevention processes.

Legal Basis

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-



Purpose

To comply with applicable KYB / KYC and AML, book-keeping and tax authorities and other relevant law enforcement agencies.

To communicate with you in relation to our services.

To keep records and analyse common issues and topics raised by customers.

To gather valuable information and conduct analysis to improve our service to you.

To improve our customer service capabilities and enhance your customer experience.

Legal Basis

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
 - Where legally required to obtain your consent to provide this information, we will obtain your consent. If consent is not required, we will provide you an option to opt-out
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
 - Where legally required to obtain your consent to provide this information, we will obtain your consent. If consent is not required, we will provide you an option to opt-out
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-



Consumer

For Consumers who use services provided by our customers, we or our relevant service provider(s) may collect and process the following information:

Category	Examples
Contact details	Name, address, phone numbers, email
Financial information	Transaction history
Information required to be obtained and kept by law	Book-keeping relevant information
Technical and behavioural tracking data	IP address, location data, pages viewed on our website or applications, whether email communications (including embedded links within them) are opened, cookie identifiers, the types of devices you are using to access or connect to our applications, unique device IDs, device attributes, network connection type and provider, network and device performance, browser type, operating system, and application version

The purpose and legal basis for processing the personal data outlined above will be:

Purpose	Legal Basis
To process a payment made by the consumer via a card or through the use of any method that we offer from time to time.	<ul style="list-style-type: none"> <input type="checkbox"/> To fulfil our contractual agreement with you <input checked="" type="checkbox"/> To comply with applicable law <input checked="" type="checkbox"/> To pursue our legitimate interests
To ensure that the payment transaction is carried out in a secure manner, mitigating the risk of fraud and other criminal activities.	<ul style="list-style-type: none"> <input type="checkbox"/> To fulfil our contractual agreement with you <input checked="" type="checkbox"/> To comply with applicable law <input checked="" type="checkbox"/> To pursue our legitimate interests



Purpose

To enable the Customer to fulfil the Consumer's order and mitigate the risk of fraud and other criminal activities. The personal data will also be processed either by us or the relevant service provider(s) when handling potential complaints and disputes.

To provide a receipt to an end-customer. We or our service provider(s) will only use the consumer's email address or mobile number to send receipts and will not use or share the contact details for any other purpose unless we obtain the consumer's consent in writing, or inform the consumer prior to processing for a new purpose or for a purpose that is compatible with the purpose for which initially we collected the personal data.

Legal Basis

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

Individuals and customer representatives

For individuals and customer representatives contacting our customer support team or our business in general, via any communication channel, we will collect and process the following information:

Category

Examples

Account identification information

Unique Customer Identifier, Merchant ID number, passwords and equivalent account security information

Contact details

Name, address, phone numbers, email

Information required to be obtained and kept by law

Information required for customer identification and verification



Category

Examples

Technical and behavioural tracking data

IP address, location data, pages viewed on our website, whether email communications (including embedded links within them) are opened, cookie identifiers, the types of devices you are using to access or connect to our applications, unique device IDs, device attributes, network connection type and provider, network and device performance, browser type, operating system, and application version

Technical and behavioural tracking data

IP address, location data, pages viewed on our website or applications, whether email communications (including embedded links within them) are opened, cookie identifiers, the types of devices you are using to access or connect to our applications, unique device IDs, device attributes, network connection type and provider, network and device performance, browser type, operating system, and application version

The purpose and legal basis for processing the personal data outlined above will be:

Purpose

Legal Basis

To administer our site and applications and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

To provide you with our newsletter, if you have subscribed to receive it, and any other information that you request from us from time to time.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

To communicate with you (via the use of surveys or by other means) about any comments, queries or feedback you might have about us, our website or our applications.

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests



Purpose

To keep our website and our applications safe and secure.

To verify your identity as well as your personal and contact information.

To initiate, exercise and defend any legal claim or collection procedure.

To provide you with information about products and services we offer that we feel may interest you by post, telephone, SMS, email or via in-application notifications.

To make suggestions and recommendations to you and other users of our website and our applications about goods or services that may interest you or them.

To comply with internal compliance procedures.

To prevent misuse of our services.

Legal Basis

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
 - Where legally required to obtain your consent to provide this information, we will obtain your consent. If consent is not required, we will provide you an option to opt-out
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-

- To fulfil our contractual agreement with you
 - To comply with applicable law
 - To pursue our legitimate interests
-



Purpose

To carry out risk management and fraud prevention processes.

To comply with applicable KYB/KYC, AML, book-keeping and capital adequacy laws and to report to tax authorities and other relevant law enforcement agencies.

To communicate with you in relation to our services.

To keep records and analyse common issues and topics raised by customers.

To gather valuable information and conduct analysis to improve our service to you.

Legal Basis

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests
- When you have provided consent

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests
- Where legally required to obtain your consent to provide this information, we will obtain your consent. If consent is not required, we will provide you an option to opt-out

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests
- Where legally required to obtain your consent to provide this information, we will obtain your consent. If consent is not required, we will provide you an option to opt-out



Purpose

To improve our customer service capabilities and enhance your customer experience.

Legal Basis

- To fulfil our contractual agreement with you
- To comply with applicable law
- To pursue our legitimate interests

Collecting information from third parties

To ensure that the services we provide are secure and efficient we process personal data from selected third parties. These third-party sources (and the categories of information) include:

Category	Examples
Credit rating agencies	<ul style="list-style-type: none"> • Financial information • Information required to be obtained and kept by law
Fraud detection agencies	<ul style="list-style-type: none"> • Information required to be obtained and kept by law
Financial institutions such as banks and card networks	<ul style="list-style-type: none"> • Financial information • Information required to be obtained and kept by law
Tax authorities	<ul style="list-style-type: none"> • Information required to be obtained and kept by law
Publicly available registries maintained by or on behalf of national authorities	<ul style="list-style-type: none"> • Contact details • Information required to be obtained and kept by law
Companies in the same corporate group as us	<ul style="list-style-type: none"> • Contact details

8. Sharing your information with third parties

8.1. In order to provide our services, some of the information we collect may be required to be disclosed to our subsidiaries and affiliates or other entities.

8.2. we work with numerous third parties in order to perform our operations in the most



efficient way. We may therefore disclose personal data to those entities in order to respond to your requests or inquiries, or when necessary to fulfil the services they provide to us such as software, system, platform support, cloud hosting services, etc.

- 8.3.** We partner with financial institutions to jointly create and offer products and services. We may therefore disclose personal data to these entities in order to ensure provision of those products and services to you. In these cases, these institutions may transfer your personal data in line with their privacy policy.
- 8.4.** We may also share personal data when we are required to comply with legal obligations and respond to requests from government agencies. This includes exchanging data with other organisations for the purpose of fraud prevention and anti-money laundering measures.
- 8.5.** We may share your personal data if we believe it's reasonably necessary to protect the rights, property and safety of our company or its customers.
- 8.6.** Examples of the types of third parties we may share your information with,
 - a.** suppliers and subcontractors who provide, for example, IT support, logistics, communication, customer support, marketing, acquiring and PCI compliance services to us, in order to support us in relation to the products and services we offer and provide to you;
 - b.** our financial service partners, card scheme and payment providers, which assist us in providing our products and services to you;
 - c.** our business partners who we may share personal data with, in order for them to provide you with information about goods and services which complement and relate to our core products offering, including our merchant cash advance product
 - d.** user experience, service design and market research agencies and technology service providers that assist us in the improvement and optimisation of the products and services that we offer to customers as well as with other market research projects;
 - e.** analytics and search engine providers that assist us in the improvement and optimisation of our website and our applications;
 - f.** credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
 - g.** sharing your information with technology services providers to conduct analysis of common customer issues and topics to enhance customer experience, improving our customer service response and engagement capabilities;
 - h.** sharing your information with a party we assign our rights to, under applicable contractual arrangements; and
 - i.** sharing information with our funding partners in circumstances concerning our financial affairs.



[Example of how we use your personal data for marketing:](#)

If you are a Konect customer, we may contact you about optional extras, loyalty bonuses or promotional offers where you have consented to this or where we rely on the 'soft opt-in'. We may use information we gather about you through your use of our services to tailor these offers to you.

[We may also disclose your personal data to third parties](#)

- in the event that we sell or buy any business or assets, to the prospective seller or buyer of such business or assets and their advisors;
- if we or substantially all of the company's assets are acquired by a third-party, in which case personal data held by the company about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our various terms, policies and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for AML and fraud prevention, and credit risk purposes.

We shall share an Consumers personal data with a Customer when it is to enable the Customer to fulfil the Consumers order and mitigate the risk of fraud and other criminal activities. The personal data will also be processed when handling potential complaints and disputes. Personal data shared with a Customer will be subject to the Customer's data protection policy and not this Privacy Policy.

Where Customers process card transaction data and cardholder data, they must process this in line with the Terms and Conditions of the card payments service provider they are contracted with.

If a third-party processes personal data on our instruction, this may be a data processor. An example of this will be in relation to our suppliers of IT and marketing services. In such cases, we only share personal data for purposes that are compatible with the reasons contained in this Privacy Policy. All data processors are subject to written agreements that ensure the security of personal data and limit the transfer of personal data to third countries.

If a third-party is considered to be a data controller, we are not able to dictate how that third-party will process the data that has been provided. Examples of common third-party data controllers would be credit rating agencies or financial institutions. In such cases, the data protection policies of the third-party data controller will apply.

[Links to third-party websites](#)

Our website features third-party advertising which provides links to and from third-party websites. If you follow a link to any of these third-party websites, you should be aware that these websites have their own privacy policies and the operators of those websites will handle your information in accordance with such policies and not with this Privacy Policy. We have no control over such third-parties or their websites or privacy policies. These third-parties may contact you or permit third-parties to contact you for marketing purposes in accordance with their own privacy policies, unless you opt out of such communications.



We do not accept any responsibility or liability for third-party websites or their privacy policies. We strongly advise you to check such policies and the reputation of the website before you submit your information to, or carry out any transaction on, any third-party website.

We welcome any feedback you may have about third-party websites linked to from our website. Please email us at customercare@konekt.global

9. Sharing your information with others

Sharing your information with credit reference and fraud prevention agencies

When processing your application, we may carry out credit and identity checks on you with one or more credit reference agencies. To do this, we will give the credit reference agencies your personal data and they will give us information about you. This may make it difficult for you to get credit in the future. We may also continue to exchange information about you with credit reference agencies while you have a relationship with us, for example, if we have asked you to pay an amount you owe us and we do not receive a satisfactory reply from you within our stated time limit, or if you give us false or inaccurate information. The credit reference agencies may share your personal data with other organisations and may hold your personal data for up to six years.

We may share your information with fraud prevention agencies who may use it to prevent fraud and money laundering, and to confirm your identity. We and fraud prevention agencies may also allow law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. If fraud is detected, you could be refused certain services or finance.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to present a fraud or money-laundering risk, they can hold your information for up to six years.

Example of when we may share your personal data with our partners:

If you apply for a Cash Advance product, we or our lending partner (the provider of this product) will carry out a credit check to better understand your financial circumstances and repayment history.

Example of how we use your personal data for marketing:

If you are a Konekt customer, we may contact you about optional extras, loyalty bonuses or promotional offers where you have consented to this. We may use information we gather about you through your use of our services to tailor these offers to you.

We shall share an consumer's personal data with a Customer when it is to enable the Customer to fulfil the Consumers order and mitigate the risk of fraud and other criminal activities. The personal data will also be processed when handling potential complaints and disputes. Personal data shared with a Customer will be subject to the Customer's data protection policy and not this Privacy Policy.

If a third-party processes personal data on our instruction, they may be a data processor. An example of this will be in relation to our suppliers of IT and marketing services. In such cases, we only share personal data for purposes that are compatible with the reasons contained in this Privacy Policy. All data processors are subject to written agreements that ensure the security of personal data and limit the transfer of personal data to third countries.



If a third-party is considered to be a data controller, we are not able to dictate how that third-party will process the data that has been provided. Examples of common third-party data controllers would be credit rating agencies or financial institutions. In such cases, the data protection policies of the third-party data controller will apply.

10. How we secure your personal data

- 10.1.** We are committed to ensure your information is protected. Once we receive your information, we use various security features and strict procedures, taking into account industry standards, to ascertain the privacy and confidentiality of data and personally identifiable information. We maintain physical, technical and administrative safeguards that comply with regulatory requirements. Specifically, we use a combination of firewall barriers, data encryption techniques and authentication procedures to prevent unauthorised access to your data and to our systems. We also enforce physical access controls to our buildings and files. We test our systems regularly and also periodically form contracts with external companies to audit and test our security systems and processes.
- 10.2.** We authorise access to your personal data only to those employees who require it to fulfil their job responsibilities and provide benefits, goods or services to you. We educate our employees about the importance of confidentiality and maintaining the privacy and security of personal data.
- 10.3.** Our security procedures are constantly revised based on new technological developments to provide the highest level of protection for your personal information. However, there are numerous actions on your end that may contribute to that end. We encourage you to use a strong password and make sure it is unique and not used for other accounts of yours. You may not share it with anyone. Our representatives will never ask you for your password, so any e-mail or other communication containing such request should be treated as unauthorised or suspicious and forwarded to customer care@konekt.global
- 10.4.** If you think your password or any other aspect of your account has become compromised, you must inform us immediately at customer care@konekt.global
- 10.5.** All environments that are used in the transmission of payment transactions through the chosen service provider (acquirer) are hosted in an environment that has passed PCI DSS Level 1 service provider accreditation and are therefore required to adhere to all the requirements stated by the PCI Security Standards Council. To get more information about the different requirements of the PCI Security Standards Council please read [more here](#).
- 10.6.** Please note that the transmission of information via the internet is not completely secure and, although we will do our best to protect your information, we cannot guarantee the security of any of your information transmitted via our website or our applications. Any transmission is at your own risk. If we become aware that the security of your information has been compromised, we will notify you by email or as otherwise required by law.



11. How long will we keep your information

- 11.1.** Your personal data will be retained for the least amount of time necessary to fulfil any legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods if it is in our legitimate business interests and not explicitly prohibited.
- 11.2.** If your agreement is terminated / your account is closed / we decline your application for an account or product or you decide not to go ahead with your application for an account or product, we may take steps to mask personal data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable regulatory requirements. We will continue to use and disclose such personal data in accordance with this Privacy Policy. We may also continue to collect information from credit reference agencies to use after your account is closed. We'll do this for as long as we're allowed to for legitimate business purposes, if required to help prevent fraud and other financial crime, and for other legal and regulatory reasons.
- 11.3.** The cookies we use have defined expiration times; unless you visit our websites or use our services within that time, the cookies are automatically disabled and retained data is deleted. Please consult our Cookie Policy for more information.
- 11.4.** When we no longer need personal information, we securely delete or destroy it.

12. Cross Border transfers of data

- 12.1.** We are committed to adequately protecting your personal data regardless of where it resides and to providing appropriate safeguards for your data where the latter is transferred to recipients located outside of the EEA.
- 12.2.** With respect to transfers originating from the EEA to the U.S., we only form contracts with companies that have signed up to the EU-U.S. Privacy Shield.
- 12.3.** When we transfer your information outside of the UK and EEA (as applicable), we will rely on the fact that the UK Government or European Commission (as applicable) has determined that the recipient jurisdiction is 'adequate' for data protection; make sure that the organisations we transfer your information to apply an equivalent level of protection to that in the UK and European Economic Area (EEA) (as relevant), by placing conditions in the contract with the organisations receiving your personal data to protect it to the standard required in the UK or the EEA (as applicable); and / or possibly ask the organisations receiving your information to subscribe to international frameworks intended to allow information to be shared securely.

13. Brexit implications

The UK has left the European Union (EU), it has ceased to be an EU member state. We may still be required (for the purposes described in this Privacy Policy) to:

- transfer personal data from the UK to the EU, the EEA or elsewhere; and
- receive personal data from outside the UK (including from the EU/EEA) into the UK.



Where we make or receive such transfers, we will ensure that those transfers are lawful and (where necessary) we shall put in place appropriate measures, such as those we set out above.

14. Rights of data subjects

14.1. Whenever we process your personal data, we take reasonable steps to ensure that it is kept accurate and up to date for the purposes for which it was collected. With respect to the information related to you that comes into our possession, and recognising that it is your choice to provide it to us, we commit to enabling you to do all of the following:

- a.** Right to be informed. You have the right to be informed about the processing (collection and use) of your personal data.
- b.** Right to access. You have the right to obtain confirmation whether or not we are processing personal data about you. You may also request information about: the purpose of the processing; the categories of personal data concerned; who else within our group might have received the data; and how long it will be stored for.
- c.** Right to correction. You have the right to review and amend the record of personal data maintained by us if you believe it may be out of date or inaccurate.
- d.** Right to 'be forgotten'. You may request that we erase your personal data if such processing is not reasonably required for a legitimate business purpose as described in this policy or our compliance with law.
- e.** Right to restrict processing. You have the right to restrict the processing of your personal data, e.g. to limit the way that we use your data.
- f.** Right to portability. When technically feasible, we will, upon request, provide your personal data to you or transmit it directly to another data controller.
- g.** Right to opt-out. You can opt out from receiving electronic marketing communications from us at any time. This can be done through your account settings, by clicking the unsubscribe link in any email communication sent to you by us, or by contacting our Data Protection Officer. Please note that the latter may require a few days.
- h.** Right to withdraw consent. You are entitled to withdraw your consent to the processing of your data.
- i.** Right to complain. You have the right to lodge a complaint with the appropriate supervisory authority if you have concerns about how we process your personal data.

14.2. Reasonable access to your personal data will be provided at no cost within a month upon receiving your request to customercare@konect.global. If access cannot be provided within the timeframe detailed, we will inform you about the exact delivery date.

14.3. We reserve the right to charge you a £10 fee for administrative costs if your requests are manifestly unfounded or excessive, in particular because of their repetitive character. In accordance with our security procedures we may occasionally request proof of identity before we disclose personal data to you.



14.4. Please bear in mind that there may be legal or other reasons why we cannot, or are not obliged to, fulfil a request to exercise your rights. We will confirm what they are if that is the case.

15. How we use cookies

Our website uses cookies to distinguish you from other website users. Cookies help to provide a more personalised experience when you browse our website and allow us to improve our website. Please review our Cookie Policy for detailed information on the cookies we use and the purposes for which we use them.

16. Children

We do not knowingly collect information, including personal data, from children or other individuals who are not legally able to use our websites and services. If we obtain actual knowledge that we have collected personal data from a child under the age of 16, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age 16.

If you are under the age of 16, please do not register an account with our website or provide any information about yourself on our website. If you have already done so, please contact us.

17. Changes to our Privacy Policy

By submitting your information to us, you agree to the use of the information as set out in this Privacy Policy. If we change our Privacy Policy, we will post the changes on this page and may place notices elsewhere on our website for a reasonable period of time. Your continued use of our website and our services following any changes to this Privacy Policy will mean you accept those changes.

