



## Loop Privacy Policy

### Overview – the key information you should be aware of

(A) **Who we are:** We are PDP2021 Limited, and we provide the Loop app. If you need it, our company number is 13258992 and our registered office is 6th Floor One London Wall, London, United Kingdom, EC2Y 5EB. PDP2021 Limited is the controller of your personal information, and is responsible for your personal information. All references in this policy to "Loop", "our", "us" or "we" refer to PDP 2021 Limited.

(B) **Our values and what this policy is for:** We value your privacy and want to be *accountable* and *fair* to you as well as *transparent* with you in the way that we collect and use your personal information. We also want you to know *your rights* in relation to your information.

(A) In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please contact us at [support@loopmoney.com](mailto:support@loopmoney.com).

(C) **Who this policy applies to:** This policy applies to:

2. Users of the Loop app:
3. Prospective users of the Loop app (to whom we send marketing communications):
4. People who contact us with enquiries: and
5. Our suppliers, and employees of our suppliers.

Depending on our relationship, we will collect and use your information in different ways. Please click on the links above to find out the information that we collect about you and how we use this information.

(D) **What this policy contains:** This privacy policy describes the following important topics relating to your information (you can click on the links to find out more):

1. How we obtain your personal information:
2. Collection of your personal information and how we use it:
3. Our legal basis for using your personal information;
4. How and why we share your personal information with others;
5. How long we store your personal information;
6. Your rights;
7. Children;
8. Marketing;
9. Where we may transfer your personal information;
10. Risks and how we keep your personal information secure;
11. Links to other websites;
12. Changes to this privacy policy; and
13. Further questions and how to make a complaint.

(E) **Your rights to object:** You have various rights in respect of our use of your personal information as set out in section 11. Two of the fundamental rights to be aware of are that:



1. you may ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. you may ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

You can find out more information in section 11.

- (F) **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

### The detail – the key information you should be aware of

#### 1. How we obtain your personal information

- 1.1 You may provide us with your personal information voluntarily. We may also receive information about you from third parties such as your bank (via our open banking application programme interface (TrueLayer), marketing agencies, market research companies, our suppliers, contractors and consultants, group companies, public websites and public agencies, which we refer to as "third party sources" or "suppliers" throughout this policy.
- 1.2 You may give us personal information about yourself by setting up an account with us, using the comment sections on the Loop app, or by contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive products, deliveries, information or services from us. If you are a supplier, you may also give us personal information about you when you are offering or providing services to us.

#### 2. Collection of your personal information and how we use it

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

#### 3. Users of our Loop app

##### 3.1 What personal information we collect about you:

Loop may collect any of the following information about you and Loop may use any of the following information in the ways explained below, in section 3.2

- (a) your name;
- (b) your telephone number;
- (c) your email address;
- (d) financial information such as your bank account numbers, information about your transactions, information identifying the bank account you have with your connected bank, information about your bank balance, information to initiate and process the transfer of money on your behalf, transactions made on those bank accounts, your direct debits and standing orders (this all collected via TrueLayer);
- (e) contact details from your mobile phone address book;
- (f) your mobile device details including the type of mobile device you use;
- (g) your IP address;
- (h) your usage data, including details of your use of the Loop app;
- (i) information about your use of the Loop app through tracking tools such as Google Analytics, Appsflyer, Mixpanel and Segment;
- (j) password for access to the Loop app;



- (k) information provided when you correspond with us, including screenshots of your use of the Loop app and the information included in those screenshots;
- (l) web traffic data when you access the website loopmoney.com and when you navigate to other websites and platforms connected to the Loop app
- (m) information about your notification preferences and collection of privacy-related preferences;

The Loop app also has the functionality to use your biometric data stored on your device (e.g. fingerprint/facial recognition), to give you access to the Loop app.

### 3.2 How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (a) to provide the Loop app which allows us to deliver Loop's services to you and help you manage money within your social groups consisting of other users of the Loop app;
- (b) to authenticate your identity to grant you access to the Loop app;
- (c) to connect to and collect data from your bank so that we can retrieve and display your bank account balance and so you can initiate and complete both the making and receipt of payments through the Loop app;
- (d) to enable you to redeem rewards via our reward partners or give rewards to friends on the Loop app;
- (e) to allow you or your friends to share content from the Loop app via social media and share transactions details, including comments, reactions and other user generated content relating to your use of the Loop app;
- (f) to resolve support issues and respond to requests made to our customer support team;
- (g) to perform activities related to analytics, data analysis, insights, customer segmentation and audience creation
- (h) to perform platform services and hosting
- (i) to undertake remarketing and behavioural targeting;
- (j) to display content from external platforms;
- (k) to allow interaction with external social networks and platforms;
- (l) to undertake proactive and reactive marketing activities based on the preferences that you have set
- (m) to notify you when there are app updates or when other users of the Loop app have undertaken transactions that you need to be aware of
- (n) to contact you for feedback on the Loop so we can improve your user experience and our marketing strategy, including through customer surveys.

Please see sections 6 and 7 for more details about how we use your personal information.

3.3 Source of personal information. We receive your personal information through the Loop app and the website loopmoney.com

3.4 Special categories of data. Some of the personal information that we collect about you or you provide to us may be special categories of data. Special categories of data include information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data. If we do process special category data about you, we will only process such data with your explicit consent.



#### 4. **Prospective customers to whom we send marketing communications**

4.1 We, or third parties on our behalf, may collect and use any of the following information about you:

- (a) your name including your title;
- (b) your email address;
- (c) your telephone number;
- (d) information about your preferences;
- (e) Loop app data; and
- (f) webtraffic data.
- (g) How we use your personal information

(b) We will collect, use and store the personal information listed above, if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters).

Please see sections 6 and 7 for more details about how we use your personal information.

4.2 Source of personal information. We may receive some of your personal information from third parties, such as marketing agencies.

4.3 Special categories of data. Some of the personal information that we collect about you or you provide to us may be special categories of data. Special categories of data include information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data.

#### 5. **People who contact us with enquiries**

5.1 We, or third parties on our behalf, may collect and use any of the following information about you:

- (a) your name including your title;
- (b) your email address;
- (c) your telephone number;
- (d) information provided when you correspond with us, including screenshots of your use of the Loop app and the information included in those screenshots; and
- (e) any updates to information provided to us.

5.2 How we use your personal information

(a) We will collect, use and store the personal information listed above to deal with any enquiries or issues you have about our products and services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes.

Please see sections 6 and 7 more details about how we use your personal information.

(b) Special categories of data. Some of the personal information that we collect about you or you provide to us may be special categories of data. Special categories of data include information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data.



6. **Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:**

- 6.1 to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- 6.2 for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- 6.3 to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so;
- 6.4 to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

7. **Further processing**

5.2 Before using your personal information for any purposes which fall outside those set out sections 3, 4, 5 or 6, we will undertake an analysis to establish if our new use of your personal information is compatible with the purposes set out in those sections. Please contact us at [support@loopmoney.com](mailto:support@loopmoney.com) if you want further information on the analysis we will undertake.

8. **Legal basis for use of your personal information**

5.3 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

- 8.1 our use of your personal information is necessary if you download the Loop app and want us to deliver you our services. So we process your personal data on this basis for the following purposes: to allow you to use the app and the services included in it designed to help you manage money within your social groups, to verify your identity for security purposes, to initiate and complete transactions on the Loop platform, to allow you to share or redeem rewards via our rewards partners and to allow you to share group activities on social media; or
- 8.2 our use of your personal information is necessary for complying with our legal obligations; or
- 8.3 where neither 8.1 or 8.2 apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are to:
  - (a) run, grow and develop our business;
  - (b) operate the Loop app;
  - (c) carry out marketing, market research and business development; and
  - (d) for internal administrative purposes.

5.4 If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a *balancing test* to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at [support@loopmoney.com](mailto:support@loopmoney.com).

- 8.4 We may use your special categories of data (such as biometric data and financial data, which could be sensitive) where you have provided your consent (which you may withdraw at any time after giving it, as described below).
- 8.5 We may process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).



8.6 If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at support@loopmoney.com and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide the Loop app and associated services to.

## 9. How and why we share your personal information with others

9.1 We will share your personal information with the following third parties or categories of third parties, which include our partners and suppliers:

- (a) Logicwind who provide technical solutions to Loop and provides customer support to the Loop users and may access personal data stored within that solution when providing support and maintenance services;
- (b) analytics and search engine providers that assist us in the improvement and optimisation of our website
- (c) companies that assist in our marketing, advertising and promotional activities; and
- (d) our other service providers and subcontractors, including payment processors, utility providers, suppliers of technical and support services, insurers, logistic providers, and cloud service providers;
- (e) we may share anonymised and aggregated statistical information with our suppliers to demonstrate what interest there has been in any marketing campaigns we have assisted our suppliers in carrying out

(f)

**5.5** Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

9.2 We will also disclose your personal information to third parties:

- (a) where it is in our legitimate interests to do so to run, grow and develop our business:
  - (i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
  - (ii) if substantially all of our or any of our affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
- (b) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (c) in order to enforce or apply our terms of use, our terms and conditions for customers or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (d) to protect the rights, property, or safety of PDP2021 Limited, our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

9.3 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

9.4 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular





way, but later change your mind, you should contact us at support@loopmoney.com and we will stop doing so.

## 10. How long we store your personal information

**5.6** We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

## 11. Your rights

11.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at support@loopmoney.com at any time. You have the following rights:

- (a) **Right of access.** You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation as to whether your personal information is being used by us; details about how and why it is being used; and details of the safeguards which are in place if we transfer your information outside of the United Kingdom or the European Economic Area ("**EEA**").
- (b) **Right to update your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.
- (c) **Right to delete your information.** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us at support@loopmoney.com.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, by contacting us at support@loopmoney.com.

- (d) **Right to restrict use of your information:** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us at support@loopmoney.com.

(a) We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are by contacting us at support@loopmoney.com.

- (e) **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- (f) **Right to data portability:** You have a right to ask us to provide your personal information to a third party provider of services.

(b) This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.

- (g) **Right to object.** You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

11.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.



11.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

## 12. **Children**

12.1 You must be aged 18 or over to use Loop. Our app and services are not directed at children and we do not knowingly collect any personal information from children.

12.2 If you are a child and we learn that we have inadvertently obtained personal information from you from our websites, or from any other source, then we will delete that information as soon as possible.

12.3 Please contact us at support@loopmoney.com if you are aware that we may have inadvertently collected personal information from a child.

## 13. **Marketing**

13.1 We may collect and use your personal information for undertaking marketing by sending you push notifications via the Loop app, email, telephone and text message.

13.2 We may send you certain marketing communications (including electronic marketing communications and customer surveys) if it is in our legitimate interests to do so for marketing and business development.

13.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

13.4 If you wish to stop receiving marketing communications, you can contact us by email at support@loopmoney.com.

## 14. **Where we may transfer your personal information**

14.1 Your personal information may be used, stored and/or accessed by staff operating outside the UK or the EEA, including India, working for us, other members of our group or suppliers. Further details on to whom your personal information may be disclosed are set out in section 9.

14.2 If we provide any personal information about you to any such non-UK and non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. These measures may include the following:

(a) ensuring that there is an adequacy decision by the UK Government in the case of transfers out of the UK, or by the European Commission in the case of transfers out of the EEA, which means that the recipient country is deemed to provide adequate protection for such personal data;

(b) where we have in place standard model contractual arrangements with the recipient which have been approved by the European Commission (or the UK Government for transfers out of the UK in due course). These model contractual clauses include certain safeguards to protect the personal data.

14.3 Further details on the steps we take to protect your personal information, in these cases, are available from us on request by contacting us by email at support@loopmoney.com at any time.

## 15. **Risks and how we keep your personal information secure**

15.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

15.2 For this reason, we are committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, through the adoption of infrastructure security standards and data encryption protocols and other relevant organisational and technical measures.





15.3 In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

15.4 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

**16. Links to other websites**

1.2 Our app may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

**17. Changes to our privacy policy**

6. We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted within the Loop app and, where appropriate, notified to you via the app. Please check back frequently to see any updates or changes to our privacy policy.

**18. Further questions and how to make a complaint**

18.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact support@loopmoney.com.. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

18.2 You may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of applicable data protection laws has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of 25th January 2022.