1. Overview

We have developed this Privacy Policy to explain how we may collect, retain, process, share and transfer your Personal Data when you visit our Sites or use our Services. This Privacy Policy applies to your Personal Data when you visit Sites or use Services, and does not apply to online websites or services that we do not own or control.

This Privacy Policy is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. This Privacy Policy may be supplemented with additional notices depending on the Sites and Services concerned. Supplementary information can be found in our Cookies Notice.

Please contact us if you have questions about our privacy practices that are not addressed in this Privacy Policy.

2. What Personal Data Do We Collect?

We collect Personal Data about you when you visit our Sites or use our Services, including the following:

- **Registration, enquiries and use information –** When you register to use our Services or enquire about using our services, we will collect Personal Data as necessary to offer and fulfil the Services you request. Depending on the Services you choose, we may require you to provide us with your name, postal address, telephone number, email address and identification information to help us with your registration/enquiry. We may require you to provide us with additional Personal Data as you use our Services.
- **Service usage and experience information –** When you use our Services or access our Sites, for example, to make enquiries, book services, or any other usage, we may collect information including Personal Data about this usage.
- **Personal Data about you from third-party sources –** We may obtain information from third-party sources such as merchants, data providers, and social media platforms, where permitted by law.

- **Other information we collect related to your use of our Sites or Services –** We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

3. Why Do We Retain Personal Data?

We retain Personal Data in an identifiable format for the least amount of time necessary to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, 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 laws. We will continue to use and disclose such Personal data in accordance with this Privacy Policy.

The cookies we use have defined expiration times; unless you visit our Sites 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.

4. How Do We Process Personal Data?

We may Process your Personal Data for a variety of reasons that are justified under data protection laws in the European Economic Area (EEA) and Switzerland.

- **To operate the Sites and provide the Services, including to:**
    - initiate a transaction, respond to an enquiry, pay a bill or update you regarding new services or policies
    - authenticate your access to an Account or enquiry ○ communicate with you about your enquiries, the Sites or the Services
- **To manage our business needs**, such as monitoring, analysing, and improving the Services and the Sites' performance and functionality. For example, we may analyse User behavior and perform research about the way you use our Services.

- **To manage risk and protect the Sites, the Services and you from fraud by verifying your identity**, and helping to detect and prevent fraud and abuse of the Sites or Services.
- **To comply with our obligations and to enforce the terms of our Sites and Services,** including to comply with all applicable laws and regulations.
- **For our legitimate interests, including to:**
    - **enforce** the terms of our Sites and Services;
    - **manage our everyday business needs**, such as monitoring, analysing; and
    - **anonymise Personal data** in order to provide aggregated statistical data to third parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services.
- **With your consent, including to:**
    - **To market to you by delivering marketing materials about our products and online Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor certain Services or Site experiences to better match our understanding of your interests.**
    - **To provide personalised Services offered by us on thirdparty websites and online services. We may use your Personal Data and other information collected in accordance with this Privacy Policy to provide a targeted display, feature or offer to you on third-party websites. We may use cookies and other tracking technologies to provide these online services and/or work with other third-parties such as advertising or analytics companies to provide these online services.** ○ **To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information through the Services. We may use this information to enhance the security of the Sites and Services and provide you with location-based Services, such as advertising, search results, and other personalised content.**
    - **To respond to your requests, for example to contact you about a question you submitted to our customer service team.**

You can withdraw your consent at any time and free of charge by contacting us.

5. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Policy. We may share your Personal Data or other information for the following reasons:

With other companies that provide services to us: We share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions or enquiries, send you advertisements for our products and services, or provide customer support.

With the other parties to transactions when you use the Services, such as other Users, third party facilitators, and their service providers: We may share information with the other agents relevant to your usage our dealings with our services, including third party service providers. The information includes:

- Personal Data necessary to facilitate transactions, communications or functionality of the Service;
- Anonymous data and performance analytics to help us better understand the uses of our Services and to help us enhance Users' experiences.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for our business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations; ○ to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to us;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights; ○ to facilitate a purchase or sale of all or part of our business; ○ in connection with related services associated with using a Service; ○ to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services. ○ to companies that we plan to merge

with or be acquired by; and ○ to support our audit, compliance, and corporate governance functions.

In addition, we may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

Current Specified 3rd Parties that we work with

Finance is provided via **Jigsaw Finance Limited.**

Jigsaw Finance Limited and associated trading styles is a Credit Broker not a lender and is authorised and regulated by the Financial Conduct Authority FRN 679612. Jigsaw Finance Limited can introduce you to a limited panel of lenders, on a non-advised basis, meaning they cannot give you advice or a recommendation on products.

Please see their Privacy Policy to understand how they will collect, use and store your data.

8. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, “Cookies”) to recognise you as a User and to customise your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our cookie policy to learn more about how we use Cookies.

9. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

- **Choices Relating to the Personal Data We Collect** ○ Personal Data. You may decline to provide Personal Data when it is requested by us, but certain Services or all of the Services may be unavailable to you. ○ Location and other device-level information. The device you use to access the Sites or Services may collect information about you, including Geolocation Information and User usage data that we may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the device.
- **Choices Relating to Our Use of Your Personal Data**
- Online Tracking and Interest-Based Advertising. We may work with partners and third-party service providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of third-party advertising-related cookies and web beacons, in which case our advertising should not be targeted to you.
    - For more information on third-party advertising-related cookies and interest-based advertising, and to learn how to opt-out of these practices with companies participating in industry self-regulation, please visit **Your Online Choices**.
- **Choices Relating to Platform Connections** ○ If you authorise a platform connection to a third-party account or platform, such as a social media account, you may be able to manage your connection preferences from our platforms or the third-party account or platform. Please refer to the privacy notice that governs the third-party platform for more information on the choices you may have.
- **Choices Relating to Cookies** ○ You may have options available to manage your cookies preferences. For example, your browser or internet device may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by visiting AboutCookies.org. You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on a Service or Site. ○ You may have an option

regarding the use of cookies and other tracking technologies when you use a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to “remember” certain things about you, and we will use cookies and other tracking technologies to the extent that you permit them. ○ You can learn more about our cookies and tracking technologies by visiting our Cookies Policy page.

- **Choices Relating to Your Registration and Account Information** ○ If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. Contact us if you do not have an Account or if you have questions about your Account information or other Personal Data.
- **Choices Relating to Communication** ○ **Notices, Alerts and Updates from Us:**
- **Marketing:** We may send you marketing content about our Sites, Services, products or updates, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications we send by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.
- **Informational and Other:** We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

10. What Are Your Rights?

Subject to limitations set out in EEA data protection laws, you have certain rights in respect of your Personal Data. In particular, you have a right of access, rectification, restriction, opposition, erasure and data portability. Please contact us if you wish to exercise these rights. If you wish to complete an access request to all personal data that we hold on you, please note that photo identity will be required to prove your identity.

11. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorised access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centres, and information access authorisation controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of any password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorised.

12. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of majority. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a child under the age of majority, we will promptly delete it, unless we are legally obligated to retain such data. Please contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of majority.

13. What Else Should You Know?

Changes to this Privacy Policy.

We may revise this Privacy Policy from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Policy will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on our website. We also may notify Users of the change using email or other means.

14. Contact Us

You may contact us if you have general questions or concerns about this Privacy Policy and supplemental notices or the way in which we handle your Personal Data.

15. Definitions

- **Device Information** means data that can be automatically collected from any device used to access the Site or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device IP address; information about you're your device's web browser and internet connection you use to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).
- **Geolocation Information** means information that identifies, with reasonable specificity, your location by using, for instance, longitude and latitude coordinates obtained through GPS or Wi-Fi or cell site triangulation.
- **Personal Data** means information that can be associated with an identified or directly or indirectly identifiable natural person. "Personal Data" can include, but is not limited to, name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport number).
- **Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

- **Services** means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by us.
- **Sites** means the websites, mobile apps, official social media platforms, or other online properties through which we offer the Services and which has posted or linked to this Privacy Policy.
- **Technical Usage Data** means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.
- **User** means an individual who uses the Services or accesses the Sites and has established a relationship with us or otherwise uses the Services as any type of participant to usage of the service.