

This Privacy Policy is issued by Letty Ltd (company number 14332694) on 19th July 2024.

Parties

- (1) Letty Ltd ("Letty"), an HR technology and financial wellbeing company registered in England and Wales with company number 14332694 and its registered office at 6 Garrick House, Devonshire Road, London, W4 2AL.
- (2) The individual users of Letty Ltd's services ("you" or "your").

1. Definitions

- 1.1. **Letty** means Letty Ltd (company number 14332694, registered in England and Wales).
- 1.2. **We/Us/Our** means Letty.
- 1.3. **You/Your** means the individual user of Letty's services.
- 1.4. **Personal data** means any information relating to an identified or identifiable living individual.
- 1.5. **Processing** means any operation performed on personal data, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.6. **Data controller** means the entity that determines the purposes and means of processing personal data. Letty is the data controller of personal data processed through or in connection with its services.

2. Collection of Personal Data

2.1. Types of personal data collected

- (a) We collect the following types of personal data: name, date of birth, job title, employee ID, contact details, compensation history, benefits enrolment, financial transactions, AI chat and support communication history, and consultation history.

2.2. Source of collection

- (a) Some personal data is provided directly to us by employers for the purposes of providing our services to you as an employee benefit.
- (b) Other personal data is provided voluntarily by you directly when you register for an account with us and during your use of our services.

2.3. Basis for collection from employers

- (a) Where your employer provides personal data to us, the processing of this personal data is necessary for the performance of a contract to which you are party, being the provision of our services to you as an employee benefit by your employer.

2.4. Basis for collection from users

- (a) Where you provide personal data to us directly, we will rely on your consent for the processing of this personal data for the purposes set out below. Your consent will be indicated by your registration for an account with us and use of our services.

2.5. Purposes of collection

- (a) Your personal data will be collected and processed for the purposes of providing personalised financial guidance and advice tailored to your individual circumstances.
- (b) Your personal data may also be processed to improve and further develop our services.

2.6. Sensitive personal data

- (a) We will not seek to collect or otherwise process any sensitive personal data about you, such as data concerning health, without first obtaining your explicit consent.

3. Use of Personal Data

3.1. Provision of services

- (a) Letty processes your personal data to provide personalised financial guidance and connect you to relevant professionals via chatbots, apps and other digital channels. This includes using your data to understand your financial situation and needs in order to tailor the service.

3.2. Improving services

- (a) Letty processes your personal data to better understand how its services are used and to develop and improve them based on analytics. Aggregated and anonymised data may be used for this purpose.

3.3. Compliance with legal obligations

- (a) Letty may process your personal data as necessary to comply with applicable laws and regulations, including tax and accounting rules.

3.4. Legitimate business interests

- (a) Letty relies on its legitimate business interests to use personal data for marketing and promotional purposes, subject to your right to object.

3.5. Consent

- (a) Letty will ask for your specific consent to use personal data for any purposes beyond the above, such as sharing data with third parties. You have the right to withdraw consent at any time.

4. Sharing of Personal Data

4.1. We may share your personal data with our group companies and third-party service providers who provide services to us, including cloud hosting, IT, system administration and customer support. This sharing enables them to support us in providing our services to you and is always subject to contractual assurances that your personal data will be kept securely and only used for the provision of services to us.

4.2. We may share your name, employee ID and contact details with your employer as necessary to verify your eligibility for our services, understand your benefits package and employment details in order to personalise our guidance for you.

4.3. With your consent, we may share your name, contact details and details of the types of advice you have requested with financial professionals who we think

can help you based on your needs. This helps us connect you to relevant experts for any further guidance or services you require.

- 4.4. We may disclose your personal data if required to do so by law or pursuant to inquiries from authorised government or legal bodies to comply with applicable laws, court orders, or valid legal processes.
- 4.5. If we sell or transfer part or all of our business or assets to another organisation, such as in a transaction like a merger, acquisition, liquidation, or similar event, your personal data may be disclosed to our advisers and any prospective or actual purchaser or new owner of our business or the assets.
- 4.6. We will not otherwise share, distribute or lease your personal data to third parties unless we have your consent or are required to do so by law.

5. International Data Transfers

- 5.1. We may transfer personal data to countries outside the UK and EEA (European Economic Area) that have been approved by the European Commission as providing an adequate level of protection for personal data.
- 5.2. For transfers to any other countries, we will ensure personal data receives an adequate level of protection by using certain safeguards, including:
 - (a) Standard contractual clauses approved by the European Commission which give personal data the same protection it has in the EEA.
 - (b) Binding corporate rules, where approved by the relevant data protection authorities, which are binding intra-group policies with our third-party

service providers and give personal data the same protection it has in the EEA.

- 5.3. Individuals have the same rights regarding their personal data, regardless of where that data is processed.
- 5.4. Individuals may contact us to request access to, rectification, erasure or restriction of processing of their personal data, and to exercise other rights regarding their personal data as explained in this Privacy Policy.

6. Data Security

- 6.1. Letty implements appropriate technical and organisational security measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- 6.2. Access to personal data is restricted to authorised personnel who require access for the purposes of their role. Access is controlled through multi-factor authentication and encryption of devices containing personal data.
- 6.3. All personal data held electronically is encrypted in transit using TLS 1.2 (or higher) encryption and at rest using industry standard AES-256 (or equivalent) encryption.
- 6.4. Where possible, Letty anonymises personal data used for research and analytics purposes to prevent re-identification of individuals.
- 6.5. Letty maintains secure backup infrastructure and backups of personal data with a reputable third-party backup provider. Backups are encrypted in transit and at rest with restricted access controls.

- 6.6. Letty will notify the relevant supervisory authority and data subjects without undue delay of any personal data breaches in accordance with its legal obligations.
- 6.7. Letty conducts regular risk assessments and audits of its technical and organisational security measures to protect personal data and ensure their ongoing effectiveness.
- 6.8. Letty regularly reviews and enhances its security measures in response to new risks and developments in security technology.

7. Data Retention

- 7.1. Letty will retain personal data for no longer than is necessary for the purposes for which it was collected.
 - (a) As a guide, Letty will retain:
 - (i) Employment details for the duration of employment plus 6 years from termination;
 - (ii) Financial guidance records for 7 years from the date of collection or provision of guidance.
- 7.2. Retention periods are determined based on legal and regulatory requirements as well as Letty's legitimate business purposes including maintaining records for potential disputes or investigations.
- 7.3. Personal data will be securely deleted or anonymised after the retention period has elapsed.

- 7.4. Any backups containing personal data will also be deleted within 6 months of the retention period elapsing.
- 7.5. Personal data may be retained for longer if required by law or if relevant for the establishment or defence of legal claims.
- 7.6. The individual will be informed of any extended retention periods.

8. Your Legal Rights

8.1. Right to access your data

- (a) You have the right to request a copy of the personal data we hold about you. We will provide this to you within one month of your request.

8.2. Right to rectification

- (a) You have the right to request that we rectify any inaccurate personal data we hold about you.
- (b) We will rectify the data within one month of your request.

8.3. Right to erasure

- (a) You have the right to request that we delete your personal data.
- (b) We will comply with your request and delete the data within one month, unless there is a legal requirement for us to retain it.

8.4. Right to restrict processing

- (a) You have the right to request that we restrict processing of your personal data in certain circumstances, such as while a complaint is being resolved.
- (b) We will comply with your request and only process the data to establish/defend legal claims or protect rights of another.

8.5. Right to data portability

- (a) You have the right to request your personal data in a portable format and transmit it to another data controller.
- (b) We will provide your data in a commonly used machine readable format within one month.

8.6. Right to object

- (a) You have the right to object to processing of your personal data for direct marketing or on grounds relating to your particular situation.
- (b) We will stop processing your data for direct marketing or the specified grounds as soon as we receive your objection.

8.7. Rights in relation to automated decision making and profiling

- (a) You have the rights not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.
- (b) We do not engage in any automated decision making or profiling.

8.8. Right to lodge a complaint with the ICO

- (a) You have the right to lodge a complaint with the UK Information Commissioner's Office if you believe we have not complied with applicable data protection laws.

9. Changes to this Privacy Policy

- 9.1. Right to update. Letty may update or amend this privacy policy at any time to ensure it remains up-to-date and accurately reflects how and why Letty uses personal data. The updated versions will be made available on Letty's website.
- 9.2. Notification of changes. If any updates are made to this privacy policy that materially affect how Letty processes personal data, Letty will take reasonable steps to notify users. This may include email notification to primary email addresses provided to Letty.
- 9.3. Application of changes. Any changes made to this privacy policy will apply both to information that was previously provided and to information provided going forward.
- 9.4. Right to object. Users have a right to object to the application of any updated versions of this privacy policy by requesting erasure of their personal data or ceasing use of Letty's services.
- 9.5. Date of effect. Updated versions of this privacy policy will be dated to indicate the date from which the changes are effective. Continued use of Letty's services after this date will constitute acceptance of the updated privacy policy.

10. Contact and Complaints

- 10.1. Contact details. The data protection officer of Letty Ltd can be contacted at team+privacy@letty.app or by post at Data Protection Officer, Letty Ltd, 6 Garrick House, Devonshire Road, London, W4 2AL.
- 10.2. Complaints. If you wish to make a complaint about our use of your personal data, please contact us at team+privacy@letty.app or write to us at the address above. We will respond to let you know who will be handling your complaint and indicate a timeframe in which you can expect a response. This will normally be within one month.
- 10.3. Complaints process. We aim to address any complaints quickly and constructively. If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office. Their contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113.