

Paynut Ltd Privacy Policy

Last reviewed 1st August 2019

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1. Who are we?

Paynut provides services that help merchants accept bank transfers for their goods or services. The controller for the personal data involved when you use Paynut, visit our website or communicate with us, or transact with a merchant using our payment services, is:

Paynut Ltd.
Heathcote
Fordingbridge
Hampshire,
SP6 2JA

2. What personal data do we collect?

2.1 Merchants

We collect personal data when you enquire about, set up, administer and use a Paynut account.

1. **Identification information**, such as name, address, email address, phone number, birthdate, government-issued identification (for example, a passport or driver's license), and account username and password.
2. **Financial information**, such as sort code, bank account number and account holder name and address.
3. **Goods and Service information**, such as the name and cost of any goods and services offered by a merchant.
4. **Transaction information**, such as the date and time, payment amount, good or service tendered, and the devices used to complete the transactions.
5. **Device and connection information**, such as the type of device you use to access our services, operating system and version, device identifiers, network information, log-in records, IP address and location derived from it.
6. **Merchant verification information**, from agencies who provide identity verification or credit references, from financial institutions, from social media or from other public sources.

2.2 Payers

We may collect personal data when you make a payment initiated using our services.

1. **Identification and contact information**, such as your name and email address.
2. **Transaction information**, such as the names of the transacting parties, a description of the transactions, the payment amounts, and the devices and payment methods used to complete the transactions.
3. **Device and connection information**, such as the type of device you use to access our services, operating system and version, device identifiers, network information, IP address and location derived from it.

3. How do we use personal data?

3.1 Using personal data to provide our services

We use personal data where it is necessary to provide the services you request.

1. To provide payment initiation services, we use the identification, contact and financial information of merchants. We use transaction information to deliver key features of the services, such as displaying transaction history.
2. We use personal data to communicate with you, like sending payment notifications, alerting you to changes in the service, or providing customer support.
3. We use personal data to prevent fraudulent or unauthorised use of our services.

3.2 Using personal data for our legitimate interests

We use personal data for our legitimate business interests. When we do, we make sure we understand and work to minimise its privacy impact. For example, we limit the data to what is necessary, control access to the data, and where we can, aggregate or de-identify the data.

1. We use personal data to develop and improve our products and services. For example, we might use data to analyse how people engage with our services so that we can develop new products or features.
2. We use personal data to promote our services, communicate news and industry updates, and host or participate in events.
3. Where we believe it is necessary to protect our legal rights and interests and the interests of others, we use personal data in connection with legal claims, compliance, regulatory and audit functions, and in connection with the acquisition, merger or sale of a business.

4. How is personal data shared?

1. We share personal data with merchants and payers in a transaction to provide our services.
2. We work with service providers who have access to personal data when they provide us with services, such as technical infrastructure, web and app development, and marketing, analytics and survey tools. We impose strict restrictions on how service providers store, use and share data on our behalf.
3. We may disclose aggregate statistics derived from personal data in order to describe our services to prospective partners, advertisers, sponsors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

5. International Transfers

Paynut's services are offered from our United Kingdom headquarters. Personal data may also be stored and accessed by service providers located in other countries in the European Union. Some of our service providers are located in the United States or other countries that do not provide the same standard of data protection as the EU.

6. Your rights and choices

Most of the data we collect and the purposes we use it for are necessary for us to operate and improve our services or comply with any legal obligations we may have. We tell you in

the service where you can make a choice or grant consent. When you grant consent, you may withdraw it at any time to stop any further processing.

You may have certain rights under data protection law. These include the right to **ask Paynut for a copy** of your personal data, to **correct**, **delete** or **restrict** processing of it, and to **obtain personal data in a format you can share with a new provider**. You may have the right to **object** to processing. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data.

If you have unresolved concerns, you have the **right to complain** to a data protection authority where you live or work, or where you believe a breach may have occurred.

7. How long do we keep personal data?

Paynut keeps personal data for as long as necessary to provide our services and process payments for our merchants. We also keep personal data for other legitimate business purposes, such as complying with our legal obligations, resolving disputes, preventing fraud, and enforcing our agreements. Because these needs can vary for different data types used for different purposes, retention times will also vary.