

COMMUNION SAVES LTD

PRIVACY NOTICE

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This privacy notice describes how **Communion Saves Ltd ('we', 'us')** collects and processes personal information about you, how we use and protect this information, and your rights in relation to this information.

This privacy notice applies to all personal information we collect or process about you when you register with us to use our services when you send us completed questionnaires, and/or when you download our mobile application ("**App**"). Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

PERSONAL INFORMATION WE USE

We will collect personal information about you from a variety of sources, including information we collect from you directly (e.g. when you contact us, or register with us to use our services), and information we collect about you from service providers and business partners that perform business operations for us, such as due diligence platforms verifying your identity for anti-money laundering compliance.

We may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations.

Information we collect directly from you

The categories of information that we collect directly from you include the following:

- (a) personal details (e.g. name, date of birth)

- (b) contact details (e.g. phone number, email address, postal address or mobile number)
- (c) photographs
- (d) authentication and identification information (e.g. user identification number, username, password)
- (e) employment information (e.g. National Insurance Number, annual income)
- (f) financial information (e.g. bank details, financial goals, expenditure patterns)
- (g) demographic information (e.g. nationality)
- (h) information we collect automatically from you, including IP address, MAC address, and data collected using our cookies and other device identifying technologies.
- (i) correspondence you had with us

Information we collect from other sources:

We collect information about you from AML/KYC or due diligence providers.

The categories of information that we collect about you from other sources include the following:

- (a) personal details (e.g. name, date of birth)
- (b) contact details (e.g. phone number, email address, postal address or mobile number)
- (c) verification information including, where permitted by local law, background check information (e.g. information to ensure that the customer is validated and in compliance with anti-money laundering regulation)

Special categories of personal data

Some of the categories of information that we collect are special categories of personal data (also known as sensitive personal information). In particular, we may process personal information that relates to your health, such as your mental wellbeing.

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information to:

- (a) identify you and create a profile for you when you register with us to use our services including when you download an App
- (b) verify your identity when you access and use our services including the App to ensure the security of your information
- (c) provide our services, including enabling our members to help reach their financial

goals by setting aside a portion of their income in our third party savings account

- (d) communicate with you with respect to the services that we provide
- (e) provide and personalise our services, including product improvements and business intelligence
- (f) create personal accounts and tailored product design
- (g) for internal analytics purposes, by aggregating your data
- (h) deal with your enquiries and requests
- (i) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies
- (j) exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law
- (k) contact you with marketing and offers relating to products and services offered by us (unless you have opted out of marketing, or we are otherwise prevented by law from doing so)
- (l) personalise the marketing messages we send you to make them more relevant and interesting

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfil our contractual obligations to you, for example to provide the services you request.
- (b) to comply with our legal obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering obligations
- (m) to meet our legitimate interests, for example to understand how you use our services and to enable us to derive knowledge from that enable us to develop new services. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

We may obtain your consent to collect and use certain types of personal information when we are required to do so by law (for example, in relation to our direct marketing activities, cookies and tracking technologies, or when we process sensitive personal information). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information
- rectify the information we hold about you
- erase your personal information
- restrict our use of your personal information
- object to our use of your personal information
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- lodge a complaint with your local data protection authority.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, please contact us at hello@communionsaves.com.

4. AUTOMATED DECISION MAKING

The way we analyse personal information for the purposes of fraud prevention may involve profiling, which means that we may process your personal information using software that is able to evaluate your personal aspects and predict risks or outcomes. We may also use profiling, or otherwise employ solely automated means, to make decisions about you that relate to your use of the services. This is known as "automated decision-making" and is only permitted when we have a legal basis for this type of decision-making.

We may make automated decisions about you:

- Where such decisions are required or authorised by law, for example for fraud prevention purposes
- Where you give your consent to us carrying out automated decision-making.

Subject to local legal requirements and limitations, you can contact us to request further information about automated decision-making, object to our use of automated decision-making, or request an automated decision to be reviewed by a human being.

5. INFORMATION SHARING

We may share your personal information with third parties including under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies for analytics services, data storage/hosting, customer communications, advertising, back-office constructions, web services, and to facilitate the transfer of funds from your current account to our partner account. Please note that we request permission within the App to allow us to track you via our marketing partners - if you ask us not to, we will not. This is in compliance with Apple's [App Tracking Transparency Framework](#)
- Law enforcement agency, court, regulator, government authority or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Privacy Policy.

6. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

Option 1 for retention:

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under the law
- Defend or bring any existing or potential legal claims
- Deal with any complaints regarding the services

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

7. INTERNATIONAL DATA TRANSFER

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information by the UK government.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

8. CONTACT US

Communion Saves Ltd is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please email: hello@communionssaves.com.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the UK Information Commissioner.

9. CHANGES TO THE POLICY

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time.

If we change this privacy notice, we will notify you of the changes. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

13th July 2023