

MONEY PATHWAY PRIVACY NOTICE

MONEY PATHWAY values the privacy and security of the information you share with us. This Privacy Notice applies to information collected through the website of MONEY PATHWAY, www.moneypathway.co.uk (“**the website**”), by MONEY PATHWAY, from third parties, or which is provided to MONEY PATHWAY. This Notice describes how MONEY PATHWAY collects, uses, shares, protects, or otherwise processes your personal information.

By using this website and/or accepting the services of MONEY PATHWAY, you agree to the terms of this Privacy Notice.

Introduction

We understand that protecting personal data is a big responsibility. This Privacy Notice is intended to help you understand what information is collected by MONEY PATHWAY, why that information is collected, how it is used, and how you can exercise your legal rights.

We may update this Privacy Notice from time to time without notice. This document was last updated on 5 September 2022.

About MONEY PATHWAY

MONEY PATHWAY is the trading name of Claire Evans, whose address is 1 Highgrove Park, Teignmouth, Devon TQ14 8FA. References in this Privacy Notice to “MONEY PATHWAY” are references to Claire Evans in her capacity of her provision of services under the MONEY PATHWAY brand.

Claire Evans acts as controller of all personal data which is processed in relation to the MONEY PATHWAY business.

If you have any questions about this Privacy Notice, you can get in touch by emailing: claire@moneypathway.co.uk.

Collection and Use of Personal Data

Personal data, or personal information, means any information about a living individual from which that person can be directly or indirectly identified. It does not include data where the identity has been removed (anonymous data).

MONEY PATHWAY collects personal information in order to provide its services and to operate the website.

MONEY PATHWAY may collect, use, store and transfer different kinds of personal data, such as:

- **Identity data:** such as first name, maiden name, last name, marital status, title, date of birth and gender;
- **Contact data:** such as billing address, email address and telephone numbers;
- **Financial data:** such as bank account and payment card details;
- **Usage data:** such as information about how you use the website and services; and
- **Marketing and communications data:** such as your preferences in receiving marketing from us, and your communications preferences.

MONEY PATHWAY does not collect any **Special Categories of Personal Data** (such as religious or philosophical beliefs, information about health, and so on).

MONEY PATHWAY does not hold or store credit/debit card details.

If you fail to provide the personal data which MONEY PATHWAY needs to collect by law, or which needs to be collected under the terms of contract we have with you, then we may not be able to perform the contract we have with you or which we are trying to enter into with you.

How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions:** you may provide personal data to us through corresponding with us; and
- **Third parties or publicly available sources:** we may receive information from third parties and/or through publicly available sources through the performance of our services. For example, we may obtain identity and contact data from public records such as Companies House.

How we will use your information

MONEY PATHWAY will only use your personal data in accordance with data protection law.

We will usually use such information for:

- website registration;
- enabling sales and other transactions, and to perform contracts;
- processing payments and settlement of our invoices;

- measuring, improving and customising our services; and
- fulfilling other technical, logistical, financial, tax, legal, compliance, administrative or back office functions.

We may also use personal data for our legitimate interests, but only where your interests and fundamental rights do not override those interests, or to comply with a legal obligation.

Generally, MONEY PATHWAY does not rely on consent as a legal basis for processing personal data, although where you do provide your consent you have the right to withdraw this consent at any time by contacting us.

The below table sets out the circumstances where we will usually process personal data, and our lawful basis for doing so:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To provide our services, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how

leave a review or take a survey		customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, administration, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Third-party websites

Our website and our mobile applications contain links to third-party websites. We are not responsible for the privacy practices or the content of third-party sites, and we have no liability for external sites and materials. Please read the privacy policy of any website you visit.

Cookies and logs

MONEY PATHWAY collects information related to your use of our website using cookies and log information.

Cookies are small files containing strings of text stored on your computer. MONEY PATHWAY uses cookies to authenticate you as a user when you log in, track your session, deliver content specific to your preferences and interests, and provide other functions.

Log information may include web requests, Internet Protocol address, operating system, browser type, browser language, date and time of your request, and cookies that may uniquely identify your browser.

MONEY PATHWAY uses this information to enhance the functionality of the website and to make your access more convenient, secure, and efficient.

MONEY PATHWAY also uses information gathered from logs and cookies to monitor website performance; improve website design, functionality, and security; and assemble web analytics and activity trends. MONEY PATHWAY retains such information for as long as reasonably required for business purposes or as reasonably required to comply with our legal obligations.

Google Analytics

MONEY PATHWAY uses Google Analytics, a web analytics service. Google Analytics uses cookies and other means to help MONEY PATHWAY analyse how users use the site. See Google's Privacy Policy.

'Do Not Track' notifications.

Some browsers allow you to automatically notify websites you visit not to track you using a "Do Not Track" signal. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit www.ico.org.uk

How you can access, update or delete your data.

If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honoured only to the extent it is no longer necessary for any services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

If you would prefer not to receive further messages from us, then please tell us at claire@moneypathway.co.uk.

If you would like to obtain records on the data we hold on you then please request this by email to claire@moneypathway.co.uk.

Data Protection Authority.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Security

MONEY PATHWAY combines technical and physical safeguards with employee policies and procedures to protect your information.

We work to protect your personal information during transmission by using Secure Sockets Layer software, which encrypts the information that you provide online at our website.

We will use commercially reasonable efforts to protect your information. We will also continue to assess new technology for protecting information and upgrade our information security systems when appropriate.

Further, we permit only authorised MONEY PATHWAY employees to access any personal information. If an employee misuses personal information, we may take disciplinary action, up to and including termination of employment. If any third-party individual or organisation misuses personal information, we will take action, up to and including termination of any agreement between MONEY PATHWAY and that individual or organisation.

Data Integrity

MONEY PATHWAY processes personal information only for the purposes it was originally collected and in accordance with this Privacy Statement.

MONEY PATHWAY takes commercially reasonable steps to ensure that the personal data is relevant, reliable for its intended use, accurate, complete, and current for the purposes for which it is used. MONEY PATHWAY retains information for as long as reasonably required for business purposes or as reasonably required to comply with our legal obligations.

MONEY PATHWAY may send you relevant marketing communications considered to be of interest based on your profile. We aim to bring you the best offers available. If you would prefer not to receive further

messages from us or our carefully selected partners, then please tell us at claire@moneypathway.co.uk.

If you would like a copy of the data we hold on you or would like us to delete all your data then please email us at claire@moneypathway.co.uk.

How long will we hold your data

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Disclosures of personal data

MONEY PATHWAY may disclose personal information where:

- We consider necessary to do so in order to comply with applicable laws or regulations, or to exercise, establish or defend legal rights. For example, in such circumstances we may share personal information with regulators, government authorities, law enforcement, the courts or other third parties.

- Personal data may also be processed by trusted third-party suppliers, such as reputable cloud-storage providers who provide electronic data storage and backup services. We will ensure that there are appropriate safeguards in place to ensure that personal data will be protected by these suppliers.
- We may share personal data with third parties in connection with a sale of MONEY PATHWAY or a merger with another entity.
- MONEY PATHWAY has reasonable grounds to believe that use or disclosure is necessary to protect the rights, privacy, property, or safety of our users or other people;
- MONEY PATHWAY has reasonable grounds to believe that the information relates to the breach of an agreement or violation of the law that has been, is being, or is about to be committed;
- it is necessary for fraud protection, risk reduction, or the establishment or collection of funds owed to us;
- it is necessary to enforce or apply our legal agreements, to pursue remedies, or to limit damages to MONEY PATHWAY;
- the information is public; or
- you have provided consent or with your direction.

International Transfers

MONEY PATHWAY may use providers who provide their services outside of the UK, such as electronic data storage and backup

providers. Use of such providers would involve the transfer of personal data outside of the UK.

Where we transfer data to a country which has not been deemed to provide an adequate level of protection for personal data, we will take further measures, such as entering into specific contracts which are approved for use in the UK and which give personal data the same protection that it has in the UK.

Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct

marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data (the 'right of portability'). In certain circumstances, you may have the right to request that we transfer your personal data to you or to a third party selected by you. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

Contact Information

If you have questions or concerns related to this Privacy Statement, please contact us by email claire@moneypathway.co.uk.