



# CLIENT PRIVACY POLICY (UK)

## ABSTRACT

This data privacy use and retention notice applies to all personal data collection and processing activities carried out by DigiDoe.

January 2026

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## About Us

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### Purpose of this privacy policy

This privacy policy aims to give you information on how DigiDoe Limited collects and processes your personal data through your use of this website and our services, including any data you may provide through this website when you process payments, take actions relating to your account, communicate with our Client Managers and during the onboarding process.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware.

### Controller

DigiDoe Limited registered in England and Wales with company number 11944257 and registered with the ICO with registration number ZB087262 is the controller and is responsible for your personal data (collectively referred to as "DigiDoe", "we", "us" or "our" in this privacy policy).

We personally oversee all questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Our services are not directed to individuals under 18. We do not knowingly collect children's data. If you believe a child has provided data, please contact us so we can delete it promptly.

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](http://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.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: DigiDoe Limited  
Email address: [info@digidoe.com](mailto:info@digidoe.com)  
Postal address: 80 Strand, London, WC2R 0RL

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 25 September 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **2. What information do we collect from you?**

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We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, marital status, title, date of birth, language spoken, nationality and/or citizenship.
- Employment Data name of employer or nature of your relationship with the client using our services (for example, if you are a director or shareholder of your company), and job title.

- Background Check Data includes information about criminal convictions and offences, information contained in identification documents, and other relevant "know your customer" checks information (such as financial information).
- Contact Data includes work and residential address, email address and telephone numbers.
- Financial Data includes bank account and payment card information.
- Transaction Data includes details about your incoming and outgoing payments, transactional counterparties and relevant information pertaining to these transactions.
- Technical Data includes internet protocol (IP) address, your login information, browser type and version, time zone setting, location, browser plug-in types and versions, and operating system.
- Profile Data includes your username and password, your preferences, and feedback and survey responses.
- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties, and your communication preferences.
- Criminal offence data: Where required for onboarding and compliance with anti-money laundering and sanctions laws, we process information about criminal convictions and offences. We only do this where permitted by the UK Data Protection Act 2018 Schedule 1 conditions and with appropriate safeguards (see section 4 and 9)

We may receive information about you if you use any of the other websites we operate or the other services we provide.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). However, we do collect information about criminal convictions and offences.

## If you fail to provide personal data

Where we need to collect personal data by law or to comply with our regulatory obligations (such as to carry out "know your customer" checks) or under the terms of a contract we have or are trying to enter with you, your business or employer and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you, your employer or business. In this case, we may have to decline to provide or cancel the relevant service, but we will notify you and/or your business or employer if this is the case at the time.

## 3. How do we collect your data?

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

- Direct interactions. You may give us any of the data listed above by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - register with us;
  - subscribe to our service or publications;
  - use our services;
  - request marketing or information about our services to be sent to you; or
  - give us feedback or contact us for any reason.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details. Where cookies are not strictly necessary, we will obtain your consent before placing them.
- Third parties or publicly available sources. We are also working closely with third parties (including service providers, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies) and may receive and exchange information about you with them. We may also receive information about you from your employer or business in connection to an application for or use of our services. If you receive a payment from a client using our services, then they will provide your information to us to facilitate the payment.
- Compliance & risk screening providers (e.g., identity verification, sanctions/PEP and adverse media screening, fraud-prevention vendors) to help us meet our legal and regulatory obligations.

## 4. What we do with your data?

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We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with our legal and/or regulatory obligations.
- In limited circumstances, with your explicit consent. Where we rely on consent, you have the right to withdraw your consent at any time by contacting us.

### Lawful bases for sensitive processing (criminal offence data)

Where we process criminal offence data for onboarding, ongoing monitoring, fraud and sanctions controls, we do so under UK GDPR Article 6(1)(c) (legal obligation) and/or Article 6(1)(f) (legitimate interests) together with DPA 2018 Schedule 1 conditions (e.g., para 10 – preventing/detecting unlawful acts and/or para 12 – regulatory requirements).

### Purposes for which we will use your personal data

We have set out below, in table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client for a DigiDoe electronic money account	Identity, Company, Background check data, Contact, Financial, Profile	(a) Performance of a contract with you, (b) Complying with legal and regulatory obligations (c) Your consent

<p>To provide our services to you like:</p> <ul style="list-style-type: none"> <li>- issuing electronic money to you in exchange for receiving money from you or on your behalf;</li> <li>- holding electronic money to you in exchange for receiving money from you in your electronic money account in multiple currencies;</li> <li>- facilitating payments to and from your electronic money account</li> </ul>	<p>Identity, Company, Background check data, Contact, Financial, Transactional, Profile</p>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you,</li> <li>(b) Complying with legal and regulatory obligations</li> <li>(c) Our legitimate interests</li> <li>(d) Your consent</li> </ul>
<p>To contact you about our services:</p> <ul style="list-style-type: none"> <li>- if you have given us your contact information, we may use these details to get in touch with you about the services we offer such as by following up on an incomplete registration process or to email you details of offers you may be interested in;</li> <li>- you may opt out of this at any time by telling us, or if we have contacted you via email, you will be given an option to opt out by clicking the relevant email link</li> </ul>	<p>Identity, Company, Contact, Profile, Marketing and Communications</p>	<ul style="list-style-type: none"> <li>(a) Our legitimate interests</li> <li>(b) Your consent</li> </ul>
<p>To improve our services:</p> <ul style="list-style-type: none"> <li>- we may use your personal data to analyse how you are using the service and to gain insights into how we can improve our products and services</li> </ul>	<p>Identity, Company, Contact, Financial Transaction, Technical, Profile, Usage</p>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you,</li> <li>(b) Our legitimate interests</li> <li>(c) Your consent</li> </ul>
<p>To deliver Customer Support and account administration services:</p> <ul style="list-style-type: none"> <li>- we may use your personal data to provide you with customer support or to investigate complaints or concerns about your account</li> </ul>	<p>Identity, Company, Contact, Financial, Transaction, Technical, Profile, Usage</p>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you,</li> <li>(b) Complying with legal and regulatory obligations</li> <li>(c) Our legitimate interests</li> <li>(d) Your consent</li> </ul>

<p>To provide information about related products and services:</p> <ul style="list-style-type: none"> <li>- we may use your personal data to provide you with information on related products and services that you may be interested in, such as home contents insurance or utility providers. This information will be provided electronically, either via our website, app, or email;</li> <li>- we will not transfer any of your personal data to third parties for this purpose unless you give us your explicit consent</li> </ul>	<p>Contact, Profile, Marketing and Communications</p>	<p>(a) Your consent</p>
<p>To provide information to third parties or DigiDoe Group companies for marketing purposes and for related products and services:</p> <ul style="list-style-type: none"> <li>- in certain circumstances, we may ask for your consent to share your persona; and data with explicitly identified third parties so that they can contact you for marketing purposes or provide you with their own products or services.</li> <li>- we will only do so if you have given us your explicit consent to share your personal information in this way, which can be given via a pop-up screen on the Website or our app</li> </ul>	<p>Contact, Profile, Marketing and Communications</p>	<p>(a) Your consent</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting or data)</p>	<p>Identity, Company Background check data, Contact, Financial, Transaction, Technical, Profile, Usage</p>	<p>(a) Our legitimate interests (b) Complying with legal and regulatory obligations</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>Company, Financial, Transaction, Technical, Profile,</p>	<p>(a) Our legitimate interests (b) Complying with legal and regulatory obligations</p>

	usage, marketing, and Communications	
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### ***Automated decision-making and profiling***

We use automated systems (including transaction and fraud-risk models) to help detect unusual or potentially fraudulent activity and to comply with AML/sanctions obligations. We do not make decisions based solely on automated processing that produce legal or similarly significant effects without meaningful human involvement. If we ever do, you will be informed and you will have the right to obtain human review, to express your view and to contest the decision.

### ***Marketing***

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### ***Promotional Offers***

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

### ***Opting out***

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us using the contact details above.

We comply with the Privacy and Electronic Communications Regulations (PECR). We will only send non-essential marketing by email/SMS with your consent (or soft-opt-in where permitted). You can withdraw consent at any time using the unsubscribe link or by contacting us.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see DigiDoe Limited Cookie Policy.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

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In order to deliver our services, your personal data may also be transferred to the following third parties:

- Other companies in the DigiDoe Group and who are based in Luxembourg and the United States and provide communication, compliance, IT and system administration services and undertake analytics and reporting.
- Service providers that may be acting as processors or controllers based in United Kingdom or the European Union who provide IT, system administration, identification and two-factor authentication services.
- Professional advisers, including lawyers, bankers, auditors, and insurers based in the United Kingdom, the European Union, and the United States, who provide consultancy, banking, legal, insurance, and accounting services.
- HM Revenue & Customs, regulators, and other authorities based in the United Kingdom, the European Union (including European Union authorities), and the United States.
- Law enforcement agencies, judicial bodies, government bodies, and tax authorities.
- Third-party credit reference agencies, in circumstances where we may need to assess creditworthiness.
- Our banking partners to provide you with necessary services.
- FX brokers to provide you with forex services

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- Other third parties where we are permitted by law to share your personal data, it is in our legitimate interests or those of a third party, and it is not inconsistent with the purposes outlined above.
- Payment systems and scheme operators, correspondent banks and fraud-prevention agencies, to process payments, prevent fraud and meet regulatory obligations.
- FCA-approved EMD Agents involved in distributing our services. We remain the controller for personal data relating to our regulated activities; Agents act on our instructions and must escalate suspected fraud/sanctions issues to us (see Section 6 and 9 for safeguards/rights).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

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We take the security of your data very seriously, and all of your personal data will be kept according to strict safeguards and in compliance with the UK GDPR and EU GDPR (as applicable). We share your personal data within the Digidoe Group. Your data is stored primarily in the UK/EEA. Where we transfer personal data outside the UK (or EEA), we use one of the safeguards permitted by law, including:

- the jurisdiction in question has been assessed as providing an adequate level of protection for personal data; or
- we have entered into a contract with the entity to which we transfer your personal data to ensure that it is adequately protected.
- a UK adequacy regulation for the destination country;
- the ICO International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses; and/or
- where transferring to certified US organisations, the UK-US Data Bridge (UK extension to the EU-US Data Privacy Framework).

We also carry out transfer risk assessments where appropriate.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

## **7. Data security**

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We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We routinely test and monitor the resilience of our security controls and vendor environments. Where we use EMD Agents or third-party processors, we require contractual security, confidentiality and breach-notification obligations consistent with UK GDPR.

## **8. How long we will keep your data for?**

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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.

We will keep core customer records (including Contact, Identity, Financial and Transaction Data) for the period required by law and regulation. For AML purposes, this is five years from the end of the customer relationship (or longer only where permitted/required—e.g., ongoing investigations, tax, accounting or legal claims). Where a longer period is justified, we document the reason and limit access accordingly.

We will keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for ten years after they cease being customers for tax and documentation purposes.

In some circumstances you can ask us to delete your data: see section 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

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Under certain circumstances, you have rights under data protection laws in relation to your personal data.

These include the right to:

- Be informed about what personal data we hold and how we are using it. This information is contained within this privacy notice.

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. You can do so, by making a 'subject access request' to us.

- 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 may always object to further use of your data for direct marketing purposes by clicking the "unsubscribe" button within marketing emails or by contacting us by writing to us at [Info@DigiDoe.com](mailto:Info@DigiDoe.com). In

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

- Where we use solely automated decision-making that has legal or similarly significant effects, you have the right to obtain human review, to express your view and to contest the decision.
- 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 to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format free of charge and on request. 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. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact DigiDoe Limited at 80 Strand, London, WC2R 0RL or by emailing [info@DigiDoe.com](mailto:info@DigiDoe.com).

We may need to verify your identity before acting on your request. We aim to respond within one month, and we will tell you if we need more time for complex requests.

Should you be dissatisfied with our response or wish to complain to the relevant supervisory authority, you can do so by contacting the Information Commissioner's Office (ICO). Contact details for the ICO can be found on this [webpage](#). If you are in the EEA, you can contact the relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA.

### ***No fee usually required***

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### ***What we may need from you***

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### ***Time limit to respond***

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**(END)**