



## Privacy Policy

We are Fluency App Ltd (“we”, “our”, “us”), registered at 71-75, Shelton Street, London, United Kingdom, WC2H 9JQ and we operate under the name of Fluency.

Fluency is data controller under this Privacy Policy, which sets out the manner in which Fluency, as data controller, may use your Personal Data.

### 1. SCOPE OF POLICY

We’re committed to protecting and respecting your privacy.

If you have any questions about your personal information please chat with us through the Fluency app, or by emailing us at [help@fluencybank.com](mailto:help@fluencybank.com)

This privacy policy will inform you as to how we look after your personal data when you:

- Visit our website [www.fluencybank.com](http://www.fluencybank.com) (Site) (regardless of where you visit it from);
- Use our Fluency mobile application (App) once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device;
- Use any of the services accessible through the App or the Site (the Services); and tell you about your privacy rights and how the law protects you.

### Controller

We’re registered with the Information Commissioner’s Office under number ZA510757.

### Complaints

If you have a complaint, please contact us through the app or by emailing [help@fluencybank.com](mailto:help@fluencybank.com) and we’ll do our best to fix the problem.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

## **Fluency will:**

- Always keep your data safe and private.
- Never sell your data.
- Allow you to manage and review your marketing choices at any time.

## **2. THE INFORMATION WE HOLD ABOUT YOU**

We will collect and process the following data about you:

2.1 Information you give us "Submitted Information": This is information you give us about you by filling in forms on the App and/or the Site, or by corresponding with us by e-mail or via the chat functions on the App and/or the Site. It includes information you provide when you register to use the App, download or register the App, subscribe to any of our services, enter into any transaction on the App or the Site participate in discussion boards or other social media functions on the App or the Site, enter a competition, promotion or survey and when you report a problem with an App, the Services, or the Site. If you contact us, we will keep a record of that correspondence.

2.2 The information you give us may include your name, address, date of birth, e-mail address, phone number, the Device's phone number, username, password and other registration information, financial, details of your bank account including the bank account number, bank sort code, IBAN, details of your debit and credit cards including the long number, relevant expiry dates and CVC, identification document numbers, copies of identification documents (for example, passport, driving license and utility bill) personal description and photograph and any other information you provide us in order to prove your eligibility to use our services.

2.3 Information we collect about you and your device. Each time you visit the App or our Site we will automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information and the type of mobile device you use, a unique device identifier;
- information about your visit, including the full uniform resource locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, device information;

- transaction information including date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the merchant or ATMs associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment and the payment instrument used;
- information stored on your Device, including if you allow Fluency access contact information from your address book, login information, photos, videos or other digital content, check ins (Content Information). The App will periodically recollect this information in order to stay up-to-date;
- details of your use of our App or your visits to our Site including transaction details relating to your use of our services, including who you have sent money or electronic money to, foreign exchange transactions you have entered into, the time, date and location of the place the transaction was entered into.

2.4 Location Information. We use GPS technology and your IP address to determine your location. This may be used when the Fluency App is running in the foreground and the background of your Device. This is used to prevent fraud, for instance if your mobile phone is saying that you are based in the UK but your card is being used to enter into an ATM Withdrawal or point of sale purchase in Italy, we may not allow that transaction to be processed.

2.5 Information to help us deliver our service to you. We work closely with third parties in order to help us deliver our Service to you. Any organisation which supports any of our services you use, when they need it to offer those services.

That includes:

- anyone who works for us when they need it to do their job,
- third party providers in technical, payment and delivery services,
- advertising networks,
- analytical, Know Your Customer (KYC) and cyber security service providers.
- credit reference agencies,
- authorities that detect and prevent fraud and terrorism (including authorities outside the UK if one of your payments is processed through a worldwide payment system).
- customer service providers and developers.

2.6 If you allow us to, we will collect friends lists from social media networks such as Facebook and similar information from other third parties such as Google – the App will periodically re-collect this information in order to stay up-to-date.

### **3. HOW WE USE YOUR INFORMATION**

To provide our services. We use it to:

- carry out our obligations arising from any transactions you enter into with us and to provide you with the information, products and services that you request from us;
- provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you.
- verify your identity to protect against fraud, comply with financial crime laws and to confirm your eligibility to use our products and services;
- notify you about changes to our service;
- facilitate social interactions through our services and to make you aware if any of your contacts who are our users and have location services enabled, are in the same area as you and/or have utilised any of Fluency's products and features.
- ensure that content from our site is presented in the most effective manner for you and for your computer.
- administer our Site and the App for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our Site and the App to ensure that content is presented in the most effective manner for you and for your computer;
- allow you to participate in interactive features of our service, when you choose to do so;
- verify your identity, protect against fraud, comply with anti-financial crime laws and to confirm your eligibility to use our products and services; and
- comply with our regulatory obligations.
- help us better understand your financial circumstances and behaviour so that we may make decisions about how we manage your account;

### **4. MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

#### **Promotional offers from us**

We may use your personal data and location 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.

You may receive promotional communications from us via email, SMS, in-app messages, telephone or post if you have requested information from us or signed up

to use our Services, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that communication.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third-party company for marketing purposes.

### **Retargeting**

Sometimes we use social media sites to retarget/remarket our products such as Facebook or Twitter and Services to a similar audience as that of our existing customer base. Some of the data that we disclose to social media sites is Aggregated Data or anonymised data. We will only disclose your personal data to social media sites if we have your consent or it is in our legitimate interests to do so.

### **Opting out**

You can ask us or third parties to stop sending you our marketing messages at any time by logging into our App and checking or unchecking relevant boxes under account settings, to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time here. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/Service purchase, product/Service experience or other transactions.

## **5. 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 our Site may become inaccessible or not function properly. For more information about the cookies we use, please see <https://fluencybank.com/cookies>.

## **6. WHERE WE STORE YOUR DATA**

We might transfer and store the data we collect from you somewhere outside the European Economic Area ('EEA'). People who work for us or our suppliers outside the EEA might also process your data. We may share data with organisations and countries that:

- The European Commission say have adequate data protection.
- We've agreed standard data protection clauses with.

## **7. HOW LONG WE KEEP IT**

We keep your data as long as you are using Fluency, and for 6 years after that to comply with the law. In some circumstances, like cases of anti-money laundering or fraud, we may keep data longer if we need to and/or the law says we have to.

## 8. YOUR RIGHTS

### You have a right to:

- Access the personal data we hold about you, or to get a copy of it.
- Make us correct inaccurate data.
- Ask us to delete, 'block' or suppress your data, though for legal reasons we might not always be able to do it.
- Object to us using your data for direct marketing and in certain circumstances 'legitimate interests', research and statistical reasons.
- Withdraw any consent you've previously given us.
- To do so, please contact us through the app or by emailing [help@fluencybank.com](mailto:help@fluencybank.com)

### 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 may 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 may 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.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you 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. In this case, we may have to cancel your use of the Fluency Services but we will notify you if this is the case at the time.

## 9. CHANGES TO PRIVACY POLICY

We will post any changes we make to our privacy notice on this page and, if they're significant changes we'll let you know by email.