

# Centtrip

Last updated: July 2021

## Privacy Policy

Centtrip is made up of different legal entities. This Privacy Policy is issued on behalf of the Centtrip Group so when we mention "Centtrip", "we", "us" or "our" we are referring to the relevant company in the Centtrip Group responsible for processing your data. We will let you know which entity will be the controller for your data when you apply for an account or purchase services with us.

The Centtrip Group comprises of Centtrip Limited (UK), Centtrip Europe BV and Centtrip Inc (US).

We respect your right to privacy and we are committed to protecting your personal information.

This Privacy Policy describes how we collect, store, maintain, protect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Policy applies to personal information that we collect through our website at [www.centtrip.com](http://www.centtrip.com) ("**Website**"), over the **phone** and our app ("**App**") or otherwise in our dealings with individuals.

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 information about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.

### What personal information does Centtrip collect and why?

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

The personal information that we may collect about you broadly falls into the following categories:

- **Applications and On-boarding:**
  - **Information provided by our personal clients**

If you apply for an account through our Website or App, we may collect certain personal information to verify your identity and to open and manage an account with us. This may include name, contact details, date of birth, identification documents, financial information, photos and call and video recordings.

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- **Information provided by or in relation to our corporate clients**

If a corporate client applies for a corporate account with us, we may collect certain personal information to verify the identity of its shareholders, directors or other associated individuals to open and manage an account with us. This may include full name, contact details, identification documents, video and call recordings and financial information.

- **Information that we obtain from third party sources**

We use third party providers for verification purposes only and may receive personal information about you from these third parties (including credit agencies) but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

Centtrip only uses a credit rating agency for verification purposes to verify identity, age and residency of individuals, to identify and track fraud, to combat money laundering only. At no time does Centtrip use the credit rating agency to rate credit worthiness and therefore does not affect an individual's credit rating.

Centtrip uses Transunion (formerly known as CallCredit) and Experian for these purposes. Further details can be found here: [www.callcredit.co.uk/legal-information/bureau-privacy-notice](http://www.callcredit.co.uk/legal-information/bureau-privacy-notice) & <https://www.experian.co.uk/privacy/privacy-and-your-data>

- **Customer services:**

- **Information that you provide voluntarily**

If you contact our customer services team by phone (please note that calls may be recorded for security, training and monitoring purposes) or email we may collect personal information certain personal information to verify your identity, and answer any queries you may have about your Centtrip account. This may include full name, contact details, identification documents, call recordings, recent transactions, Centtrip account number, address details, Centtrip originated one time only codes and financial information.

- **Using our Website or App:**

- **Information that you provide voluntarily**

When you send us an email or visit our Website or App we may collect personal information volunteered by you: for example, we may ask you to provide your contact details to register and manage a Centtrip account with us, to subscribe to marketing communications from us, to submit enquiries to us and/or provide services you have requested. We may also use your personal information to provide information relating to account related information and product/services updates and reports. The

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personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

- **Information that we collect automatically**

When you visit our Website or App, we may collect certain information automatically from your device.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for to enable users to access the Website, our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

- **Information that we obtain from third party sources**

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include Merchant Category Code (MCC) location data and we use the information we receive from these third parties to maintain and improve the accuracy of the records we hold about you or for mapping of card transaction information in app.

- **Statistical Reports:**

- We may also use the information collected to prepare high level anonymised statistical reports, which contain details such as the average number of company directors being authorised signatories to a company's accounts. The information in these reports is never personal and you will never be identifiable from them. We may share these statistical and anonymised reports with third parties.

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## Who does Centtrip share my personal information with?

We may disclose your personal information to the following categories of recipients that are based in the UK and the US:

- to our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website, assist with identity verification and KYC purposes or set up payment schemes and merchant related transactions), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information;
- to **any competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to **an actual or potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy;
- to **professional advisers** including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- to **any other person with your consent** to the disclosure.

## Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we need the personal information to perform a contract with you, where the processing is in our legitimate interests and not overridden by your rights, or where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

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Our legitimate interests include providing our clients with the services they request and administering our contracts, undertaking anti-fraud and money laundering checks and assisting partners with theirs, improving our products, assisting in our legal, tax or accounting needs, and marketing our products and services.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

## **Cookies and similar tracking technology**

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see <https://www.centtrip.com/assets/files/centtrip-cookie-policy.pdf> (the "Cookie Policy").

## **How does Centtrip keep my personal information secure?**

We have put in place appropriate technical and organisational measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. All data stored by Centtrip is encrypted using 256-bit AES keys to protect data files at rest and in motion with 128-bit AES SSL/TLS encryption. Our systems are tested and proven by approved penetration testing companies regularly.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## **International data transfers**

Centtrip may transfer your personal information to other countries to be processed by Centtrip or its third-party data processors for the purposes identified in this Privacy Policy. By providing personal information to Centtrip or accessing the Website or App, you consent to the storage, processing and transfer to countries other than the country in which you are resident. When this is done, we will ensure an adequate level of protection for your rights and freedoms in relation to the processing of your personal information.

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## Data retention

We will only retain personal information we collect from you for as long as reasonably necessary where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, accounting or reporting requirements). We may retain your personal information 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.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

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We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## Third-party websites

Our Website may also contain links to third-party websites, plug-ins and applications. These third-party sites may provide additional information, goods, services and/or promotions. These sites are owned and operated independently from us, and have their own privacy and data collection practices. When you leave our Website, we encourage you to read the privacy policy of every website you visit, as any personal information you provide to these websites will be governed under the terms of their privacy policy.

## Updates to this Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review and may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the last updated date displayed at the top of this Privacy Policy.

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

## How to contact us

If you have any questions or concerns about our use of your personal information or this Privacy Policy, please contact us using the following contact details:

By email: [privacy@centtrip.com](mailto:privacy@centtrip.com)

Address: Centtrip, 1 Mark Square, London EC2A 4EG, United Kingdom

If you have a complaint about the way we handle your personal information, you also have the right to address this with the data protection authority of the country in which you live or work or the country in which we are located. We would, however, appreciate the chance to deal with your concerns before you approach the relevant authority so please contact us in the first instance.

## California residents

If you live in California, the California Consumer Privacy Act (the 'CCPA') California law may provide you with additional rights regarding our use of your personal information. We acknowledge that our

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activities and actions will be subject to any such limitations and we would like to assure you that Centtrip does not disclose your personal information for others' direct marketing purposes and we do not sell your personal information.

## Dutch residents

If you live Holland, the General Data Protection Regulation (GDPR) laws will apply. Under this regime you have the right to:

- Obtain confirmation as to whether your personal information exists and to be informed of its content and source, verify its accuracy and request its correction, completion, update, or amendment;
- Request the deletion, anonymization or restriction of the processing of your personal information processed in breach of the applicable law;
- Object to the processing, in all cases, of your personal information for legitimate reasons;
- Receive an electronic copy of your personal information, if you would like such a copy for yourself or to port your personal information to a different provider;
- Request that your personal information is not sold to third parties (where applicable);
- Lodge a complaint with the relevant data protection supervisory authority.