

# Centtrip

## Privacy Policy

Centtrip Limited (referred to in this Notice as "Centtrip", "we", "us" or "our") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice 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.

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 Notice.

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

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.

- **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 identities, ages 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) for these purposes. Further details on Transunion can be found here: <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>

- **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.

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- **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 in order 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 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. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

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.

## **Who does Centtrip share my personal information with?**

We may disclose your personal information to the following categories of recipients:

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- 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 who otherwise process personal information for purposes that are described in this Privacy Notice 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 Notice;
- 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).

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/terms-conditions-privacy-cookies#our-story-link> (the “Cookie Policy”).

## How does Centtrip keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. 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.

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## International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our websites, web and app platform servers are located exclusively in the EU and our group companies and third-party service providers and partners also operate in the EU. This means that when we collect your personal information we may process it in any country in the EU.

## Data retention

We retain personal information we collect from you 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 or accounting requirements).

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.

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. 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. Any personal

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information you provide to these websites will be governed under the terms of their privacy policy.

## **Updates to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, 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 Notice changes if and where this is required by applicable data protection laws.

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

## **How to contact us**

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

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

Address: 1 Mark Square, EC2A 4EG

The data controller of your personal information is Centtrip Limited.