



Our Privacy Notice

LOQBOX

1. Who we are

nooli UK Limited (“nooli”) is the parent company of a group of companies. In the UK, these companies are:

LOQBOX Technology UK Limited

LOQBOX Savings Limited

DDC Financial Solutions Limited

LOQBOX Trustee UK Limited.

nooli and its UK subsidiaries are private limited companies registered at Henleaze Business Centre, Henleaze, Bristol, England, BS9 4PN.

This Privacy Notice applies to all personal information processing activities of nooli and its subsidiaries, together the nooli UK group. References to “we” and “us” in this notice refer to nooli and its UK subsidiaries.

nooli and its UK subsidiaries may act as Data Controllers in respect of personal information that we process in connection with our business, and there may be situations where a group company acts as a Data Processor.

We respect individuals’ right to privacy and to the protection of their information. The purpose of this Privacy Notice is to explain the information we collect, how we use and share it, how to manage your marketing preferences and a confirmation of your rights. It is important that you read this Privacy Notice when we are collecting or processing personal information about you so that you are aware of how and why we are using your personal information.

We may update this Privacy Notice from time to time, and we will publish the latest version on our website and would encourage you to visit our website regularly to stay informed of how we use your data.

If you have any questions regarding this Privacy notice, please contact us at privacy@loqbox.co.uk .

2. The information we collect and use



Personal information means any information which relates to an individual and can be used for the purposes of identification, either directly or indirectly, typically through the use of an identifier.

We collect, process and use the following kinds of personal information at the start of, and during, your relationship with us:

Identity – title, first name, last name, date of birth

Contact details – email address, telephone number, residential address

Financial data – bank account details

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, and your operating system and platform.

Usage information - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products 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, and any phone number used to call our customer service number.

We will limit the collection and processing of information to information that is necessary to achieve one or more legitimate purposes as identified in this Notice.

We do not collect or process special categories of information about you such as 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.

3. How we collect your information

Your information is made up of personal information we collect and hold about you and your transactions with us, and includes:

Information you give us;

Information we receive from third parties, including third parties who provide services to us and our commercial partners;

Information we learn about you through our relationship with you and the way you operate your products;

Information that we gather from the technology which you use to access our services.

We also receive information from other sources, including information about you if you use any of the other websites we operate or the other services we provide.

Please note that if you do not agree to provide us with information we request, it may not be possible for us to continue to operate your account and/or provide products and services to you.

4. How we use your information



We will only use and share your information where it is necessary for us to carry out our lawful business activities. The lawful bases for processing your data are described below, and, in some cases, there may be more than one lawful basis for processing your information:

A. Contractual obligation

We may process your information where it is necessary to enter into a contract with you for the provision of our products and services or to perform our obligations under that contract. This may include:

- providing and administering those products and services;
- processing your payments for our products;
- communicating with you about the products and services you receive from us and any changes to the products or services provided to you;
- sharing information with commercial partners from time to time in order to support attainment of your financial goals through their products and services;
- managing and maintaining our relationship with you.

B. Legal obligation

When you apply for a product or service (and throughout your relationship with us), we are required by law to collect and process certain personal information about you. This may include processing to:

- confirm your identity;
- perform checks to detect and prevent financial crime;
- investigate and resolve complaints;
- share data with credit reference agencies and fraud prevention agencies;
- comply with legal and regulatory requirements.

C. Legitimate interests

We may process your information where it is in our legitimate interests to do so as an organisation and without prejudicing your interests or fundamental rights and freedoms. This may include processing to:

- make suggestions and recommendations to you about goods and services that may be of interest to you;
- deliver relevant content to you via our website or directly, for example, through email or SMS;
- protect the security of our business, including information security, network security and business continuity;
- monitor the performance and effectiveness of our products and services;
- send you marketing communications relating to products or services that we believe may be of interest to you.



5. How we use and share your information with other Group companies

Your information may be shared with and processed by other nooli UK group companies.

6. Sharing your information with third parties

We will not share your information with anyone outside the nooli UK group unless:

- We have your permission;
- Where required for your product or service;
- Where we are required by law;
- With third parties providing services to us, including commercial partners;
- With credit reference agencies (See section 9 for more details about Credit Reference Agencies);
- With law enforcement and or fraud prevention agencies.

7. Your rights

We want to make sure you are aware of your rights in relation to the personal information we process about you, and these are described below. You have a:

- right to access your personal data held by us;
- right to have inaccurate personal data rectified;
- right to have certain personal data erased where you believe it is no longer necessary for us to process it, where you have objected, where your personal data has been unlawfully processed, or where erasing your personal data is required in accordance with a legal obligation;
- right to request that we restrict processing of your personal data, if you believe that any of the information that we hold about you is inaccurate; we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or we are not using your information in a lawful manner;
- right to receive certain personal data in a portable format (we will provide .csv (readable on Microsoft Excel or equivalent));
- right to object to processing where the lawful basis is that it is in our legitimate interests, but please note that we may still process your personal data where there are other relevant lawful bases or where we have compelling grounds to continue processing your personal data in our interests which are not overridden by your rights, interests or freedoms;
- right to complain to the Information Commissioner's Office (ICO), the UK data protection regulator (they can be contacted via their website www.ico.org.uk);
- right to object to direct marketing, which can be done by opting-out of direct marketing via the communication itself. /li>

Where you make a request in respect of your rights we will require proof of identification. We may also ask that you clarify your request.



Please note that in some cases if you do not agree with the way we process your information we may not be able to provide, or to continue to provide, a product or service to you.

If you wish to exercise any of these rights or have any questions about them, please contact us at privacy@loqbox.co.uk.

8. How long we keep your information

We keep and maintain records to help us best serve our users, for example, in order to investigate and resolve queries relating to your products, and in line with legal and regulatory requirements.

We will keep records of users and their transactions for a period of six years after your relationship with nooli ends. This period may change based on changes in our business or our legal and regulatory obligations.

9. Credit Reference Agencies

DDC will share information with Credit Reference Agencies (CRAs) about how you manage your finance agreement including your account balance, payments into your account, the regularity of payments being made, and any arrears or default in making payments, while you have a relationship with us. This information will be made available to other organisations (including fraud prevention agencies and other financial institutions) so that they can take decisions about you, your associates and members of your household.

When CRAs process your information, they do so on the basis that they have a legitimate interest in preventing fraud and money laundering, and to verify identity, to protect their business and to comply with laws that apply to them.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail in the Credit Reference Agency Notification ("CRAIN") at <https://www.transunion.co.uk/legal/privacy-centre?#pc-credit-reference>.

For any further information about the CRAs and how your information is used by them, including requests for a copy of your information held by them, please find their contact details below:

Credit reference agency

Contact details

TransUnion



Post: TransUnion Information Group Limited, One Park Lane, Leeds, West Yorkshire LS3 1EP.

Web Address: <https://www.transunion.co.uk/consumer/consumer-enquiries>

Email: consumer@transunion.co.uk

Phone: 0330 024 7574

Equifax

Post: Equifax Limited, Customer Service Centre PO Box 10036, Leicester, LE3 4FS.

Web Address: https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html

Email: www.equifax.co.uk/ask

Phone: 0333 321 4043 or 0800 014 2955

Experian

Post: Experian Limited, PO BOX 9000, Nottingham, NG80 7WF

Web Address: <https://ins.experian.co.uk/contact>

Email: consumer.helpservice@uk.experian.com

Phone: 0344 481 0800 or 0800 013 8888

10. Transferring information overseas

In the event that we transfer information to countries outside of the European Economic Area (which includes countries in the European Union as well as Iceland, Liechtenstein and Norway), we will only do so where:

the European Commission has decided that the country or the organisation we are sharing your information with will protect your information adequately;

the transfer has been authorised by the relevant data protection authority; and/or we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the European Commission) to ensure your information is adequately protected.

11. Security



We strive to protect your personal data and our products and services from unauthorised access. This includes use of various security measures to protect your personal data held by or on behalf of us and ongoing review of our information collection, storage and processing practices.

Subject to the uses described in this Privacy Notice, we will endeavour to treat all of your personal data in strict confidence and endeavour to take all reasonable steps to keep your personal data secure once it has been transferred to our systems. However, the internet is not a secure medium and we cannot guarantee the security of any data you disclose online. You accept the inherent security risks of providing information and dealing online over the internet and will not hold us responsible for any breach of security unless this is due to our failure to ensure we have appropriate technical and organisational measures in place as required by GDPR.

If you link to other websites from our Website then your personal data will be governed by its Privacy Notice or Policy. We recommend that you always read any such Privacy Notice or Policy before interacting with a new website to ensure you understand how your personal data will be used.

We have procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

12. Contact us

If you have any questions regarding this Privacy Notice or the way we use your personal information, please contact us at privacy@loqbox.co.uk.