

MoneyThing – PRIVACY POLICY

MoneyThing Capital Limited (“**MoneyThing**”, “**us**”, “**we**”) is a limited liability company registered in England and Wales under number 05254797. Our registered office address is 39 Church Crescent, Whetstone, London, United Kingdom N20 0JR. MoneyThing is authorised and regulated by the Financial Conduct Authority (“**FCA**”) under firm reference number 703549.

We are committed to protecting and respecting your privacy. We are registered with the Information Commissioner’s Office under registration number Z887547X).

We provide a platform (the “**Platform**”) via www.moneything.com (the “**Website**”) for lending and borrowing transactions conducted between our customers. The Platform and Website is owned and operated by MoneyThing.

1 **General**

- 1.1 Please read this privacy policy carefully as it sets out the basis on which we collect any personal information from you, or that you provide to us and how we use it in the operation of the Platform.
- 1.2 This privacy policy covers:
 - (a) visitors to our Website (“**Guests**”); and
 - (b) registered users of the Platform.
- 1.3 A registered user of the Platform may be a:
 - (a) lender; or
 - (b) borrower.
- 1.4 Please note that certain parts of this privacy policy only apply to borrowers and other parts only apply to lenders. Where this is the case, we make it clear in the relevant paragraph.
- 1.5 As well as private individuals, lenders may be limited liability companies or limited liability partnerships. Borrowers will always be limited liability companies or limited liability partnerships. In these circumstances, this privacy policy will apply to, and 'you' and 'your' refer to, the individuals who are you as the lender or you as a director, partner or authorised person of the lending or borrowing entity.
- 1.6 Any changes we may make to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

2 **Contacting us**

- 2.1 If you have any complaints or any questions about any aspect of this privacy policy or your information, or to exercise any of your rights as described in this privacy policy or under data protection laws, you can contact us:

By post: MoneyThing, 39 Church Crescent, Whetstone, London, N20 0JR; or

By email: support@moneything.com.

3 **What information do we collect from users of the Website, including Guests?**

- 3.1 You can browse this Website as a Guest without giving us any information, and we won't

know who you are. However, even if you are a Guest, please bear in mind that we may:

- (a) record, store and use information about the areas of the Website which you visit and at what times;
- (b) record, store and use information about your activities in using the Website;
- (c) collect information about your computer, such as which browser you are using, your network location, your operating system, your IP address and the type of connection you are using (e.g. broadband, ADSL etc.); and

3.2 We also collect and store data that you submit to us via email, via our optional surveys, and through our contact form and email subscription sign-up form on the Website.

3.3 We collect the information above by using cookies. Please click here to access our Cookie Policy <https://www.moneything.com/cookies-policy/> which explains what cookies we use on our Website, why we use them and how you can control them.

4 What information do we collect from or are provided with in relation to borrowers and lenders?

4.1 Additional services are available once you register with us and login to the Website. In this case, we will know who you are, your activities on the Website and information about your computer may be linked to you on our systems.

4.2 In order to provide you with such services, we may collect, store and use information you upload to the Platform.

4.3 The types of information we may request from you are:

- (a) contact information – including your name, date of birth, address, postcode and other contact information such as email address and telephone/mobile number and (where applicable) the contact details of your first of kin;
- (b) the bank or building society account details to make or receive payments on the Platform;
- (c) your passwords and security question answers;
- (d) your financial interests, financial position, or loan repayment performance;
- (e) answers to questions required by third party credit reference agencies for identification purposes;
- (f) information about your activities in using the Website; and
- (g) information from directors/individuals associated with you and/or your business.

4.4 We may retain copies of the following information about you:

- (a) any correspondence you send us, details of your registration history and any materials you post on the Platform;
- (b) passports or other identification evidence that you provide for anti-money laundering and anti-fraud purposes;
- (c) records of any surveys that you may be asked to complete for research purposes, although you do not have to respond to them;

- (d) details of transactions you carry out through the Platform and the receipt and disbursement of repayments;
- (e) details of your visits to the Website and the resources that you access;
- (f) where explicit consent has been provided, information about your physical or mental health or condition (where necessary and appropriate); and
- (g) where explicit consent has been provided, information relating to any criminal proceedings in which you have been involved.

4.5 If you give us false or inaccurate information, either directly or through an agent, and we suspect or identify fraud, we will record this.

4.6 We may also be provided with information about you from third party brokers, introducers or other referrers, who collected that information from you directly.

5 What information do we collect from brokers, introducers and other referrers?

5.1 If you are a broker, introducer or other referrer, we will collect and may retain the following personal information about you, either as a shareholder or in your capacity as a director of the company providing the broker, introducer or other referral service:

- (a) any correspondence you send us, your name, address, email address and contact numbers; and
- (b) passports or other identification evidence that you provide for anti-money laundering and anti-fraud purposes.

6 Information from other sources

In relation to borrowers only we will also check information about you held on our own records and also obtain information from credit reference agencies about you and your financial associates' personal credit behaviour and personal credit accounts. We will also search at fraud prevention agencies for information on you and your financial associates and business partners.

7 What do we do with the information we collect from users of the Website?

The main reason we use this information is to provide you with both an improved website experience and details about our products and services. Where it is in our legitimate interest to do so, we (or third party data processors, agents and sub-contractors acting on our behalf) may also use the information:

- (a) to enrich your experience and interaction with the Website by allowing you to store your details so that your preferences are retained when you revisit the Website;
- (b) to analyse site usage and improve our services;
- (c) to deliver to you any administrative notices, alerts and communications relevant to your use of the services; and
- (d) to contact you from time to time to inform you about new features, to troubleshoot problems, and to protect you against fraud or other criminal activity.

8 What do we do with the information we collect or are provided with in relation to borrowers and lenders?

Where it is in our legitimate interest to do so, we (or third party data processors, agents and

sub-contractors acting on our behalf) may use this information to:

- (a) provide you with details about our products and services;
- (b) carry out financial and identity checks, fraud prevention checks, regulatory checks and credit checks, including by using scoring methods;
- (c) (in respect of borrowers) carry out credit checks;
- (d) (in respect of borrowers) check details on applications for credit and credit related and other facilities;
- (e) (in respect of lenders) check details on applications for lending and other related facilities;
- (f) (in respect of borrowers) if you do not repay money you have borrowed, to trace your whereabouts and recover debts or enforce a loan agreement;
- (g) (in respect of borrowers) to provide you with information about goods or services offered by other companies that we feel may interest you. You will be contacted by electronic means (email or SMS) only if you have consented to this;
- (h) to carry out product development, statistical analysis and market research;
- (i) to develop and improve our services and products;
- (j) to update our records;
- (k) to advise you about the products and services that we are providing to you in response to a request from you about this;
- (l) to carry out checks required by applicable regulation or regulatory guidance;
- (m) to keep you informed about your loan agreements or security documents, as the case may be;
- (n) to allow you to participate in interactive features of the Website, when you choose to do so;
- (o) to make the Website available to you and to identify the products and services which you may be interested in;
- (p) for customer service, including answering questions and responding to feedback and complaints; and
- (q) for any other specific purposes in relation to your activities via the Platform.

In order to provide services and products to you, enter into a contract with you and to fulfil our contractual obligations, it may be necessary for us to manage your borrower or lender account with us and update the records we hold about you from time to time

Where you have given us consent, we shall provide you with information about any new products, services, events, promotions and other information which we think will be of interest to you. You can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences at any time by contacting us via the details as given in the "Contacting Us" section above.

referrers?

Where it is in our legitimate interest to do so, we (or third party data processors, agents and sub-contractors acting on our behalf) may use this information to:

- (a) provide you with details about our products and services;
- (b) carry out financial and identity checks, fraud prevention checks, regulatory checks and credit checks, including by using scoring methods;
- (c) to carry out product development, statistical analysis and market research;
- (d) to develop and improve our services and products;
- (e) to update our records;
- (f) to carry out checks required by applicable regulation or regulatory guidance;
- (g) to allow you to participate in interactive features of the Website, when you choose to do so;
- (h) to make the Website available to you and to identify the products and services which you may be interested in;
- (i) for customer service, including answering questions and responding to feedback and complaints; and
- (j) for any other specific purposes in relation to your activities via the Platform.

10 Who do we share your information with?

10.1 We won't provide your personal information to other companies for their marketing purposes unless you have given us your consent. However, we may aggregate anonymised information based on your personal information and disclose this to advertisers and other third parties.

10.2 We may disclose your personal information to third parties where it is in our legitimate interest to do so including for the following reasons:

- (a) we may share your information with analytics and search engine providers that assist us in the improvement and optimisation of our site;
- (b) we may share your personal information with companies and other third parties performing services on our behalf (for example KYC service providers, credit reference agencies, customer relationship management providers or other service providers) who will only use the information to provide that service. We may also share your personal information with other members of our corporate group, or a purchaser or potential purchaser of our business;
- (c) we may share alerts and information derived from identity verification checks with third parties for the purpose of anti-money laundering and fraud prevention;
- (d) we may share your email address and our internally generated customer ID number with Trustpilot, who will contact you to invite you to review us on the Trustpilot website, and for no other purpose. This information offers us important feedback to improve our service. If you do not respond to the invitation from Trustpilot within 30 days, Trustpilot will delete your data. If customers decide to review us using Trustpilot, the data they provide to Trustpilot will be processed and stored by Trustpilot in accordance with their privacy policy which can be found on their website. A copy of the data processing agreement between MoneyThing and Trustpilot can be

found at <https://legal.trustpilot.com/data-processing-agreement>; and

- (e) we may disclose your personal information on request to the FCA, Financial Ombudsman Service, the police or any other regulator or government authority in order to fulfil our regulatory responsibilities, to help prevent or detect fraud or any other type of crime or for any other reasonable purpose identified by the relevant authority.

Where it is necessary for us in order to carry out our obligations arising from any contract entered into with you and to provide services and products to you, we may share your data with staff operating outside the EEA who work for us or for one of our sub-contractors. Your data may be processed by such staff for the fulfilment of your order, the processing of your payment details and the provision of support services.

- 10.3 Save as set out in this privacy policy, we will not sell or disclose your data to any third party.

Borrowers

- 10.4 In addition, where it is in our legitimate interest to do so, we may disclose a borrower's personal information to:

- (a) credit reference and fraud prevention agencies to perform similar checks, trace your whereabouts and recover debts you owe. This may include details of your loans on the Platform, how you manage them and any amounts outstanding; and
- (b) debt collection agencies, security trustees and other legal representatives if required to enforce the terms of any loan agreement.

11 Where we store your personal data and international transfers

- 11.1 We are committed to ensuring that your information is safe and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

- 11.2 To deliver services and products to you and for the fulfilment of your order, the processing of your payment details and the provision of support services it may be necessary for us to transfer your personal information outside of the European Economic Area ("EEA") to our service providers and business partners located outside the EEA. This includes the USA and the Isle of Man.

- 11.3 MoneyThing has a small operational office in the Isle of Man for processing lender and borrower applications and providing customer support. Your personal data may therefore be both collected and processed in the Isle of Man.

The European Commission has decided that the Isle of Man provides adequate levels of data protection.

- 11.4 Some information you provide to us is stored on either our secure servers (which may be in the United Kingdom or the Isle of Man), stored with our third party Platform provider in the Isle of Man, or is stored with a third party secure data storage provider, which encrypts the data and keeps it in secure storage servers, which are located in data centres across the United States.

- 11.5 Where personal information is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal information, we take steps to provide appropriate safeguards to protect your personal information, including:

- (a) entering into standard contractual clauses approved by the European Commission, obliging recipients to protect your personal information;

- (b) under the EU-U.S. Privacy Shield Framework which enables U.S. business to self-certify as a means of complying with EU data protection laws.

11.6 If you want further information on the specific mechanism used by us when transferring your personal information out of the EEA, please contact us using the details set out above.

12 How long we keep your information

12.1 We will keep your data for as long as necessary to fulfil the purposes described in this privacy policy.

12.2 If you are a borrower or a lender who has entered into a loan agreement via the Platform, we will hold your data for 6 years after the end of our relationship with you. This may be, but is not limited to being once the loan is terminated, or once your application is declined, or at any point we have contact with you regarding your application or agreement. Your data is held for this long for statistical and modelling purposes including stress testing and fraud modelling.

12.3 If you provide us with your personal data but do not enter into a loan agreement either as a borrower or a lender then we will only hold your data for a maximum of 12 months from the date such data was received.

13 What credit reference and fraud prevention agencies do

13.1 When a credit reference agency receives a search from us they will:

- (a) place a credit search “footprint” on your credit file regardless of whether your application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future; and
- (b) link together the previous and subsequent names advised by you, of anyone that is a party to the account.

13.2 Credit reference agencies supply the following information to us:

- (a) information about you, such as previous applications for credit and similar personal credit information in your name or in relation to your financial associates and business partners;
- (b) public information such as County Court Judgments (CCJs) and bankruptcies;
- (c) electoral register information on you and your business partners; and
- (d) fraud prevention information.

13.3 Credit reference agencies will keep records of outstanding debt on file for six years after they are closed, whether settled by you or defaulted.

13.4 The information which we and other organisations provide to the credit reference agencies and fraud prevention agencies about you, your financial associates, your business partners and details about your business may be supplied by credit reference agencies and fraud prevention agencies to other organisations and used by them to:

- (a) prevent crime, fraud and money laundering by, for example checking details provided on applications for credit and credit related or other facilities;
- (b) check the operation of credit and credit-related accounts;
- (c) verify your identity if you, your financial associates or your business partner(s) apply

for other facilities;

- (d) make decisions on credit and credit related services about you, your financial associates and/or your business partners, or your business;
- (e) manage your personal, your financial associates, your business partner's and/or business credit or credit related account(s);
- (f) trace your whereabouts and recover debts that you owe;
- (g) conduct other checks to prevent or detect fraud; and
- (h) undertake statistical analysis and system testing.

13.5 If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- (a) checking details on applications for credit and credit related or other facilities;
- (b) managing credit and credit related accounts or facilities;
- (c) recovering debt;
- (d) checking details on proposals and claims for all types of insurance; and
- (e) checking details of job applicants and employees.

13.6 Please contact us if you want to receive details of the relevant fraud prevention agencies.

13.7 We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

14 Disclosing information about other individuals

14.1 If you are a joint applicant, or if you have told us of some other financial association that you have with another person (for example financial associates), you represent to us that you are entitled to:

- (a) disclose information about your joint applicant and anyone referred to by you; and
- (b) authorise us to search, link or record information at the credit reference agencies about you and anyone referred to by you.

14.2 An association will be created by the credit reference agencies between joint applicants and between you and anyone you tell us is financially connected with you. This will link your financial records with that person and those records will be taken into account in all future applications either by you or both of you. This will continue until one of you successfully files a disassociation at the credit reference agencies, i.e. informing them that you are no longer connected financially with a particular individual.

15 Marketing and Communications

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

15.2 If you have registered with us as a lender or a borrower or have previously asked us for information on our products or services and you have not opted out of receiving that

marketing information, we may send you information on our range of products, services, promotions, special offers and other information which we think you may find interesting by phone, email and/or SMS.

- 15.3 We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.
- 15.4 You can ask us or third parties to stop sending you marketing messages at any time by contacting us by email at support@moneything.com or in writing to us at MoneyThing, 39 Church Crescent, Whetstone, London, N20 0JR.

16 Your Rights

Access to your information and updating your information

- 16.1 You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal information which we are processing. For any further copies which you may requested, we may charge a reasonable fee based on administrative costs.
- 16.2 You also have the right to receive your personal information in a structured and commonly used format so that it can be transferred to another data controller ('data portability').
- 16.3 We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Right to object

- 16.4 You have the right to object at any time to our processing of your personal information for direct marketing purposes.
- 16.5 You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Your other rights

- 16.6 You also have the following rights under data protection laws to request that we rectify your personal information which is inaccurate or incomplete. If you think any information we have about you is incorrect or incomplete, please contact us by email at support@moneything.com or in writing to us at MoneyThing, 39 Church Crescent, Whetstone, London, N20 0JR to let us know and we will delete or update any information as soon as possible.
- 16.7 In certain circumstances, you have the right to:
- (a) request the erasure of your personal information erasure ('right to be forgotten'); and
 - (b) restrict the processing of your personal information to processing to which you have given your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of others.

17 Exercising your rights

- 17.1 You can exercise any of your rights as described in this privacy policy and under data protection laws by contacting us as given in "Contacting us" above.
- 17.2 Save as described in this privacy policy or provided under data protection laws, there is no

charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

- 17.3 Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

18 Security

18.1 We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk.

18.2 Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

18.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

19 Linking

19.1 We may link to other websites which are not within our control. In particular, we currently use the following third party solution providers:

- (a) www.trustpilot.com; and
- (b) www.p2pindependentforum.com

19.2 Once you have left our Website, we cannot be responsible for the content of other websites or for the protection and privacy of any information which you provide on these websites. Please note that these websites have their own privacy policies and website terms and conditions. We do not accept any responsibility or liability for these policies. Please check their privacy policies and their website terms and conditions when you visit them and before you submit any personal data to these websites.

20 Complaints

You also have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/>) about our data processing activities (helpline on 0303 123 1113).

This privacy policy was last updated: July 2018