



# **Privacy and cookie Policy**

**Version 1.11.2018**

## Introduction

We at MIR Limited UK Ltd (“we”, “us” or “the Company”) respect your privacy and are committed to protect the privacy of our users (“user” or “you”).

This Privacy Policy outlines our practices with respect to collecting, using and disclosing your information through your use of our website (collectively: “the Services”).

We encourage you to read the Privacy Policy carefully and use it to make informed decisions.

The Privacy Policy is a part of our [User Terms](#) and is incorporated therein by references.

By using our Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to this Privacy Policy.

In this Privacy Policy you will read about:

- **What type of information** we collect
- **How we collect** your information
- Information on the **Cookies** we use and Google Analytics
- **How we use** the information we collect
- **With whom we share the information**, and for **what purpose**
- **For how long we retain** the information we collect
- **Advertising**
- **How do we safeguard** your information
- How we use the information we collect for **marketing purposes**
- How to **contact us**

### What type of information we collect

We collect two types of data and information from our users.

The first type of information is un-identified and non-identifiable information pertaining to a user, which may be made available or gathered via your use of the Services (“**Non-personal Information**”). We are not aware of the identity of the user from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information in order to enhance the functionality of our Services. It may also include technical information such as hardware, app version, language, device information.

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Information**”). When you use our Services, you will be asked to provide Personal

Information to us. The Personal information we collect through our Services includes information which is submitted directly by the user, such as: date of birth, first name, last name, phone number; e-mail address; home address; card number; bank account and other financial information that we may need in order to provide our Services.

We may also collect Personal Information from your device (e.g. geolocation data, IP address) and information on your activity on the Services.

If we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information for as long as it remains combined.

### **How we collect information**

There are two main methods we may use to collect information:

- a. We collect information through your use of the Services. In other words, when you are using our Services, we are aware of it and may gather the information relating to such usage, either independently or through the help of third-party services as detailed below.
  
- b. We collect information which you provide us voluntarily. For example, we collect Personal Information which you provide when you: (i) respond to communications from us; (ii) open an Account and use the Services; and (iii) communicate with us via email or other means.

### **Cookies**

We use cookies and other technologies in our related services, including when you visit our site or access our Services.

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enable automatic activation of certain features, remembering your preferences and making the interaction between you and our Services quicker and easier. Cookies are also used to help ensure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our Services.

Our website uses cookies in order to provide you with Services, identify you for repeat visits, (for example to allow us to store your preferences for the next sign-in), and monitor and analyze our web access.

We use the following cookies and analytics on our Services:

<b>Cookie</b>	<b>Name</b>	<b>Purpose</b>
LinkedIn Ads	LinkedIn Ads	Enables us to track users from LinkedIn who have clicked on our adverts
Facebook Custom Audiences	Facebook Custom Audiences	Enables more targeted advertising through Facebook to our Facebook audience #
Google Analytics	Google Analytics	Provides data on the usage of the MuchBetter website by visitors
LinkedIn Analytics	LinkedIn Analytics	Provides information on visitors to our website from LinkedIn
Facebook Connect / Pixel	Facebook Connect / Pixel	Provides information on visitors to our website and app from Facebook
AddToAny	AddToAny	Enables website users to share content with a number of different social networks

# We may participate in Facebook.com's Custom Audience program which enables us to display personalized ads to persons on our email lists when they visit Facebook.com. We provide Personal Information such as your email address and phone number to Facebook to enable Facebook to determine if you are a registered account holder with Facebook. You may opt-out of participation in our Facebook Custom Audience by sending an email, from the email address you are opting out of, to support@muchbetter.com. For your opt-out to be effective, you must: (i) place the following text in the subject line of the email - "Opting Out of Facebook.com Website Custom Audience Ads", and (ii) in the body of the email, include your name and email address. We will forward your name and email address to Facebook.com with a request to delete you from all of our Facebook Custom Audience A

You may remove the cookies by following the instructions of your device preferences; You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org); however, if you choose to disable cookies, some features of our Service may not operate properly and your online experience may be limited.

### **Google Analytics**

We use a tool called "Google Analytics" to collect information about your use of the Service. Google Analytics collects information such as how often users access the Service, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Service. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not

combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits by disabling cookies on your browser. For more information on Google Analytics see: <https://www.google.com/analytics/standard/features/>. For more information on opting-out of Google Analytics see:

[https://support.google.com/analytics/answer/181881?hl=en&ref\\_topic=2919631](https://support.google.com/analytics/answer/181881?hl=en&ref_topic=2919631).

### **How we use the information we collect**

We use and share Personal Information in the manner described in this Privacy Policy. The Personal Information will be disclosed to a third party only to the extent required for the specific purpose, as stipulated in this Privacy Policy, and in such case we require the relevant third party to agree to process such information in compliance with our Privacy Policy.

In addition to the purposes listed above, the information we collect, which may include your Personal Information, is used for the following purposes:

- To set up your Account and to provide our Services (e.g. process your payments; etc.)
- To identify and authenticate your access to certain features of the Services;
- To communicate with you and to keep you informed of our latest updates;
- To serve you advertisements when you use our Services;
- To perform a research or to conduct anonymous analytics in order to improve and customize our Services to your needs and interests;
- To support and troubleshoot our Services and to respond to your queries; and
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request; including, but not limited to:
  - obtain information about you from credit reference agencies and fraud prevention agencies to check you (and / or your business's) credit status/profile and identity on a periodic basis;

The agencies may record our enquiries and may share it with other third parties and fraud prevention agencies.

Information regarding how you manage your account, and/or any debt may be supplied to other organisations by credit reference and fraud prevention agencies to perform similar checks and to trace your whereabouts and recover any debts that you owe. Records remain on file at such agencies for 6 years after they are closed, whether settled by you or defaulted. If you would like further information on our use of credit reference agencies, please contact us;

- To monitor Transactions for the purposes of preventing fraud, money laundering and cheating; This may involve utilising products and services from third parties (including the sharing of information with such third parties) to monitor transactions, detect patterns requiring investigation or otherwise profile and assess the likelihood of fraud occurring;
- Manage complaints or disputes;

#### **With whom we share the information we collect (“Recipients”)**

We do not rent, sell, or share your Personal Information with third parties except as described in this Privacy Policy. The Personal Information will be disclosed to a third party only to the extent required for the specific purpose, as stipulated in this Privacy Policy, and in such case, we require the relevant third party to agree to process and secure such information in compliance with our Privacy Policy and applicable law.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our Recipients, who may be located in different jurisdictions across the world, for any of the following purposes:

- Providing you with our Services;
- Storing such information on our behalf;
- Processing such information to assist us with our business operations (e.g. to process payments and your deposits; authenticate your access; auditing our operations, provide customer support, customer retention services, etc.);
- Performing research, technical diagnostics or analytics; and

- We may transfer or disclose Personal Information to our subsidiaries, affiliated companies and subcontractors for the purposes listed in this Privacy Policy.

We may also disclose Personal Information, or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies (including our Agreement), including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.

Some information may be shared with our trusted financial service provider – Wirecard AG. For information on Wirecard's collection and use of data in accordance with the GDPR, please follow this link: <https://www.wirecardbank.com/GDPR>

## **Merchants**

We may transfer or disclose Personal Information to our merchants for the purposes listed in this privacy policy. Additionally, with your prior authorisation, we may share personal data such as identification information or additional verification documentation with merchants with whom you already have engaged with through our product and we may, on your authorisation via the merchant, receive similar information and documentation which allows both us and our merchants to meet regulatory obligations while minimising the burden and impact on you to provide this information twice.

## **Third party collection of information**

Our Privacy Policy only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties via our Services (e.g. by clicking on a link to any other website or location) or via other sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them.

It is important to note that such third party services may have their own privacy policies and we advise you to read them carefully. Inclusion of a link to third party website or service is not a recommendation of such a website or service. Third party sites may contain information or service that is illegal, unreasonable or that some people may find inappropriate or offensive. Before using third party sites and services or before making a

purchase, we recommend you to read and understand those sites', service' or product's terms and conditions, warranty, and privacy policies and to ensure you agree to their terms. You acknowledge that we are not responsible for the products, services, or descriptions of those products or services that you receive from third party sites or to the content or privacy practices of those sites, and that this Privacy Policy does not apply to any such third party products and services. You are knowingly and voluntarily assuming all risks of using third party sites to purchase products and services. You agree that we shall have no liability whatsoever with respect to such third party sites and your usage of them

## **User Rights**

You may request to:

- a. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
- b. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
- c. Request rectification of your personal information that is in our control.
- d. Request erasure of your personal information.
- e. Object to the processing of personal information by us.
- f. Request to restrict processing of your personal information by us.
- g. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us at [dpo@muchbetter.com](mailto:dpo@muchbetter.com).

## **For how long we retain the information we collect?**

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the Services. We may also retain information we collect in order to comply with our legal obligations, resolve disputes and enforce our agreements. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.



## **How do we safeguard and transfer your information?**

We take great care in implementing and maintaining the security of the Services and your information. We employ industry standard procedures and policies to ensure the safety of our users' information, and prevent unauthorized use of any such information, and we require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

Since we operate globally, it may be necessary to transfer your Personal Information to countries outside the European Union. The data protection and other laws of these countries may not be as comprehensive as those in the European Union – in these instances we will take steps to ensure that a similar level of protection is given to your Personal Information. **You hereby consent to transfer of your Personal Information to countries outside the European Union.**

If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse our Services or acted in an inappropriate manner, please contact us directly at [dpo@muchbetter.com](mailto:dpo@muchbetter.com)

## **Corporate transaction**

We may share Information, including Personal Information, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company or of any other company within the Group. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

## **Minors**

The Services are not designated to users under the age of 18. If you are under 18, you should not download or use the Services nor provide any Personal Information to us.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a user under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [dpo@muchbetter.com](mailto:dpo@muchbetter.com) .

## **Updates or amendments to the Privacy Policy**

We may revise this Privacy Policy from time to time, at our sole discretion, and the most current version will be posted on our website (as reflected in the "Last Revised" heading). We encourage you to review this Privacy Policy regularly for any changes. In case of material changes we will notify you through our Services or by email.

Your continued use of the Services, following the notification of such amendments on our website, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

## **Complaints**

Please let us know if you are unhappy with how we have used your personal information. You can contact us at [support@muchbetter.com](mailto:support@muchbetter.com)

You also have the right to complain to the Information Commissioner's Office. You can find out more on their website how you can report a concern.

## **How to contact us**

If you have any general questions about the Services or the information that we collect about you and how we use it, please contact us at [support@muchbetter.com](mailto:support@muchbetter.com)

## **Information about us**

**MIR Limited UK Ltd** is a licensed and regulated electronic -money institution (EMI) with the UK Financial Conduct Authority (FCA) License No.: 900704

Our website can be viewed for more information on the Company.

Our company registered address is:

20-22 Wenlock Road

London

N1 7GU



MuchBetter is proud to be a member of the Electronic Money Association  
MIR Limited UK Ltd: Registered offices at 20-22 Wenlock Road, N1 7GU, London.  
Regulation: Licensed and regulated as electronic -money institution (EMI) by the UK Financial Conduct Authority  
(FCA) License No.: 900704