

This Fire-UK Privacy Statement (V1.0) is effective from 14th October 2019.

1 General Information about us

- 1.1 Fire Financial Services Limited (trading as fire.com and fire) is authorised by the Financial Conduct Authority (FCA) as an Authorised E-Money Institution (AEMI), firm reference number 900983. Our registered office is at Rise London, 41 Luke Street, London, EC2A 4DP.
- 1.2 We comply with the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018, as well as the Privacy and Electronic Communications (EC Directive) Regulations 2003, and its amendments (together “Data Protection and Privacy legislation”). We and our operating partners are committed to safeguarding the privacy and security of the information we collect.

2 Important information about this privacy statement

- 2.1 This Privacy Statement sets out the basis, on which any personal data you provide to us, or we collect from you through our website(s), our Applications and Services, or our operating partners will be processed by us.
- 2.2 Definitions are as per Definitions in our Terms and Conditions.
- 2.3 If you do not agree with this Privacy Statement, you should not open and/or operate an Account.

3 Collection of your personal data

- 3.1 We collect your personal data in order to:
 - a) allow us to provide you with our services;
 - b) monitor, analyse and improve our services;
 - c) prevent money-laundering, fraud & illegal activities, and prosecute offenders;
 - d) allow us to provide you with information, products or services that you request from us or which we feel may be communicated for a legitimate interest;
 - e) comply with legal obligations, such as Anti Money Laundering legislation.

4 How we protect and manage your personal data

- 4.1 We will take appropriate measures to ensure confidentiality of all information, both paper and electronic required for the operation of our business. We will take appropriate steps to protect data stored or transmitted against accidental or unlawful destruction, accidental loss or alteration, and unauthorised or unlawful storage, processing, access or disclosure.
- 4.2 We will ensure that your personal data will only be accessed by authorised personnel for legally authorised purposes.
- 4.3 We will only use personal data in our possession for its intended, specific and authorised purpose.
- 4.4 Your personal data will be retained and maintained in accordance with applicable Data Protection and Privacy laws and regulations. Upon request by you, we will amend the personal data we hold if factually incorrect or incomplete, and provide you with a copy of any personal data held by us.
- 4.5 All our employees are trained in applicable Data Protection and Privacy legislation and will act with due care and diligence when handling personal data.

5 Third parties and your data

5.1 We may disclose your personal information to third parties in the following circumstances:

- a) Your personal data may be transferred to contracted third parties, e.g. banks and other firms external to us for the purposes of providing our services to you. Contracted third parties are obliged to ensure that your personal data is securely managed at all times and will only use this data in line with our specific instructions;
- b) We and our contracted third parties may share your personal information with authorities both within the United Kingdom and abroad to prevent money laundering, terrorism and fraud in order to meet legal obligations;
- c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- d) In order to enforce or apply our Terms and Conditions or other agreements;
- e) To protect the rights, property, or safety of us, our customers, or others;
- f) In the event that we sell or buy (partially or wholly) any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- g) If you give explicit permission to do so.

6 Information we collect from you

- 6.1 Our customers are individuals and businesses. The information we receive and collect from prospective and live customers is strictly related to our customers and the services we provide and execute. The information we collect may include financial and other information. The above information and any contact or enquiry you make will be stored by us in line with our data retention policy.
- 6.2 When you visit our website(s) or use any of our Applications we collect your IP address and other information such as the domain and host from which you access the internet, the browser and browser version, the operating system, and type of device. We do so in order to administer our services and optimise our websites and Applications for you and to diagnose problems with our website(s) or Applications. We also use the information to assist in the fight against fraudulent or malevolent use of the Account and to ensure a better user experience. We may also employ location services to determine your approximate location for validation purposes.
- 6.3 "Cookies" are small pieces of information that are stored by your browser on your device. Like most websites and applications we use cookies to keep track of your activity and enhance your experience. We also use cookies to assist us in the fight against fraud or malice. If you wish to disable these cookies, the "help" section of the toolbar on most browsers will tell you how. However, if you set your browser to disable cookies, you may not be able to access certain areas or features of our Applications or website(s).

7 Your personal data rights

7.1 You have a right to to the following (unless it conflicts with another legal obligation):

- a) Seek access to information which we hold about you;
- b) To ask us to correct information about you which is inaccurate, incomplete or out of date;
- c) To erase your personal data unless certain conditions apply including that processing is necessary for compliance with a legal obligation;
- d) To restrict the processing of your personal data or to object to such processing;
- e) To data portability whereby your personal data can be transmitted directly from one controller to another where technically feasible.

- 7.2 Any such request should be made to us in writing to: Data Protection Officer, Fire Financial Services Limited, Rise London, 41 Luke Street, London, EC2A 4DP. or by email to support@fire.com. Your request will be dealt with as soon as possible and in any event within 30 days.

8 Retention of your personal data

- 8.1 We must comply with a number of statutory and regulatory requirements in relation to the retention of data. Your personal data must be retained for a period of no less than six years following the closure of your account with us, or six years from the date of the last transaction, whichever is the later.
- 8.2 We do not sell or rent your personal data to any third parties for marketing purposes.

9 Changes to this Privacy Statement

- 9.1 We continue to review our controls and processes to ensure that they are effective in meeting our commitments to our customers. We reserve the right to change this Privacy Statement without notice at any time and from time to time, including as needed to comply with the laws and regulations of the jurisdictions within which we operate.