

94.IO LTD CUSTOMER PRIVACY NOTICE

This privacy notice tells you what to expect us to do with your personal information.

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CONTACT DETAILS

Email

compliance@94.io

WHAT INFORMATION WE COLLECT, USE, AND WHY

We collect or use the following information to **provide services and goods, including delivery**:

- Names and contact details
- Addresses
- Date of birth
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Credit reference information
- Account information
- Information relating to loyalty programmes
- Website user information (including user journeys and cookie tracking)
- Identification documents
- Information relating to compliments or complaints

We collect or use the following information for **the operation of customer accounts and guarantees**:

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Location data
- Purchase or viewing history
- Website and app user journey information

We collect or use the following information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Location data
- Purchase or viewing history
- Website and app user journey information
- Personal information used for administration of research
- Personal information used for the purpose of research

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents

- Financial transaction information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Customer or client accounts and records
- Financial transaction information
- Correspondence

LAWFUL BASES AND DATA PROTECTION RIGHTS

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)

- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

WHERE WE GET PERSONAL INFORMATION FROM

- Directly from you
- Publicly available sources
- Credit reference agencies

HOW LONG WE KEEP INFORMATION

We'll only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy and/or in cases in which you've provided your consent (which you may withdraw at any time), or until you request it is deleted (unless a longer retention period is required or permitted by law).

Generally, you can expect us to keep your personal information while you use the Site or Sterling. Where you've created an account via the Site we'll need to keep your personal information for longer for accounting purposes-up to seven (7) years following the date on which it is provided to us. If, having registered for any of our services, you don't use them for a reasonable time (which may vary depending on the service(s) you've registered for) we may contact you to ensure you're still happy to receive communications from us.

Even if you delete, or ask us to delete your personal information it may persist on back-up or archival media for legal, tax or regulatory purposes.

WHO WE SHARE INFORMATION WITH

Others we share personal information with

- Organisations we need to share information with for safeguarding reasons
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Professional consultants
- Organisations we're legally obliged to share personal information with

HOW TO COMPLAIN

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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15 September 2024