

# OVAL MONEY PRIVACY NOTICE

Version last revised: 17/05/2021

The new Privacy Notice applies to all the customers from the 1st of June, 2021.  
You can check out the previous version of the Privacy Notice [here](#).

## 1. IMPORTANT CONTACT INFORMATION

<b>Controller Name:</b>	Monecor (London) Limited
<b>Controller Address:</b>	26 Finsbury Square, Floor 6, London, England, EC2A 1DS
<b>GDPR Central Representative:</b>	Alexandra Marsh
<b>Contact Email</b>	privacy@ovalmoney.com

## 2. INTRODUCTION AND PURPOSE OF THIS EUROPEAN WEBSITE PRIVACY NOTICE

We, the above-named Controller ("**Monecor**", "**we**", "**us**"), are committed to protecting your personal data and respecting your privacy.

This privacy notice applies to all customers and users of the Oval App or website located in the EU and the UK (the "**Privacy Notice**") from 1 June 2021 onward, and sets out the personal data we receive from you, how we process it, our legal obligations as controller, and your rights in relation to your personal data.

We will collect your data when you use:

- our website at [www.ovalmoney.com](http://www.ovalmoney.com); or
- the Oval App.

## 3. LAWFUL BASES FOR PROCESSING

We are authorised by law to carry out the processing of personal data concerning you in the pursuit of our legitimate business interests, for the purposes of performing our contract with you and/or for the purposes of assisting Oval Marketplace A.V. SLU and/or other current or future affiliates performing in their contract with you, and in some cases because the processing is necessary for compliance with a legal obligation.

## 4. WHO ARE WE?

Under Regulation (EU) 2016/679 – The General Data Protection Regulation, as it is saved and incorporated into UK law ("**GDPR**"), and other applicable data protection laws, the 'controller' of the processing of personal data set out in this Privacy Notice is Monecor (London) Limited.

## 5. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following personal data concerning you:

- a) Information you provide when you register for an Oval account, including your name, phone, number, home address, date of birth, tax residency, and ID. A video of you and a photo of your ID, the login credentials, a profile picture if you add one, details

about your financial circumstances, your bank account details or other payment details you provide to us. Information and identity documents you provide to us in order to prove your identity and/or the source of your funds.

- b) Information provided by you or generated when you use the Oval app or website including details about payments to and from your Oval account, information about your visit, including the links you have clicked on through our site (including date and time), services you viewed or searched for, page interaction information (such as scrolling and clicks), and methods used to browse away from the page; technical information, including the internet protocol (IP) address used to connect your device to the internet, your log-in information, the browser type and version, the time-zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device identifier, number, or the mobile phone number used by the device), mobile network information, your IP address and device ID for security reasons (we'll link your mobile phone number with your device), your mobile operating system, the type of mobile browser you use and so on; information stored on your device, including if you give us access to contact information from your address book, log-in information, photos, videos or other digital content, check-ins. Monecor will regularly collect information on transactions (for example, payments into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, details of device used to arrange the payment and the payment method used.
- c) If you contact us, we may keep a record of that correspondence. We may collect any other personal information you provide when you make an enquiry, request information, contact us through the chat function of the app or website, or otherwise correspond with us.
- d) We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- e) When you register, we search your record and we may collect information about you from public sources for anti-money laundering reasons or market research. We collect information from third parties, such as credit reference agencies, fraud-prevention agencies and partners who help us to provide our services. This includes your credit record, information to help us check your identity, and information relating to your transactions.
- f) In cases where, in order to provide our service, personal data is to be collected from third parties who can be considered as autonomous data controllers, such as, for instance, likes on Facebook, Instagram or Twitter put by the Users, we shall process this data in relation to the provision of our service.
- g) Depending on your use of the service, we may also collect fitness data through Apple HealthKit or Google Fit. This data will be limited to activity data and will be used only to provide additional savings options. Apple HealthKit data and Google Fit data will not be used for any marketing purposes.

## 6. **PURPOSES OF PROCESSING**

We use information held about you in the following ways:

- To ensure that content from our site and the Oval app is presented in the most effective manner for you and for your device.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

- To process any communication you send us (which includes answering any queries and dealing with any complaints or feedback you have).
- To conduct internal research to improve the way we interact and communicate with you.
- To carry out our obligations arising from any contracts entered into between you and us.
- To get in contact with you should we need to.
- To do anything which you authorise or consent to us doing.
- To take any action we are required or authorised by law to take.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- Confirming your identity when you sign up or get in touch.
- Checking your records in order to prevent illegal activities like money laundering, tax evasion and fraud.

#### 7. **STORAGE OF YOUR PERSONAL DATA**

We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk presented by the processing we carry out to protect the confidentiality, integrity and availability of your personal data and to protect against unauthorised or unlawful processing and accidental loss, destruction or damage.

Personal data concerning you will be stored for as long as the purpose exists for processing (including storing) that personal data. In order to comply with certain legal obligations and to defend Monecor from potential legal claims, it will be necessary to store personal data concerning you for up to six years after you end your relationship with us.

#### 8. **INTERNATIONAL DATA TRANSFERS**

Monecor will not transfer personal data concerning you outside the UK or EEA. For the purposes of improving the Oval app and website and other services it provides, it will transfer certain anonymised, aggregated data relating to the Oval app and website to its affiliates located in the United States but this will not affect your rights or freedoms as a data subject. If this position changes in the future we will inform you of this.

#### 9. **DISCLOSURE OF YOUR PERSONAL DATA**

In order to provide services on the Oval app and website, and to comply with applicable laws, we will disclose certain personal data concerning you to third parties as set out below and as we may inform you from time to time in the future. Where third parties are engaged in the processing of personal data, we ensure that they meet the same standards and levels of privacy and information security as we do, and that they are bound by an enforceable contract that complies with applicable data protection laws.

- Banca 5 S.p.A. – Banca 5 is an Italian bank registered at the Italian Bank registry with number 5692 and acts a service provider that reads user transactions through PSD2
- Amazon Web Services EMEA SARL – a cloud computing platform which is used for purposes of storing the data and hosting the Oval app, website, and services
- Onfido Ltd – our know-your-customer (KYC) verification provider
- Cirdan Capital Management Ltd – an investment management company who provide services in relation to the underlying assets of any investment certificates issued to you.
- SmartETN PLC – issues any investment certificates to you whereby interest or redemption payments are linked to shares or a basket of shares of mostly publicly traded companies or linked to other underlying asset classes such as debentures, government securities and/or other public securities.

- Oval Marketplace A.V. SLU - Oval Marketplace provides placing of financial instruments and reception and transmission of orders, as well as distribution of banking products to any customers based in Italy.

It will also be necessary to disclose personal data:

- If we sell or buy any business or assets, we may disclose personal data concerning you to the prospective seller or buyer of such business or assets and their advisors, to the extent necessary in each case.
- If Monecor or substantially all its assets are acquired by a third party, personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others.
- In order to comply with banking laws and regulations (these mean we sometimes need to share customer details with regulators, tax authorities, law enforcement or other third parties).

#### 10. **PARTNER WEBSITES AND APPS**

Our site may, from time to time, contain links to the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies or notices. Please check these policies when you visit, and before you submit any personal data to, these websites.

We may collect unique mobile operating system IDs, such as Apple's Identifier for Advertising ID (IDFA) or Google Advertising ID (GAID). You may be able to opt-out of interest-based advertisements through the most recent applicable settings features of their mobile devices.

#### 11. **CHANGES TO OUR PRIVACY NOTICE**

We may need to update this Privacy Notice to reflect changes to our data processing practices. If we do this and the changes are material, we will post a notice on the Oval website for at least 7 days before the changes are made and notify you through the Oval app. You can see the date this Privacy Notice was last revised at the top of the page.

#### 12. **YOUR RIGHTS**

The GDPR, and other applicable data protection legislation gives you certain specific rights relating to your personal data which are set out below.

Please note that not all these rights are absolute, and they do not apply in all circumstances. However, you are always welcome to contact us with any request relating to processing of your personal data and, even if we are not obliged by law to comply with your request, we will try to accommodate your wishes.

- Access** – you have the right to access your personal data and certain information about how and why we are processing it;
- Rectification** – you have the right to have any inaccurate or incomplete personal data rectified without undue delay;
- Erasure** – Sometimes called the 'right to be forgotten', in certain circumstances, you have the right to have your personal data erased without undue delay;
- Restriction** - in certain circumstances, you have the right to have our processing of your personal data restricted;

- (e) **Data portability** - in certain limited circumstances, you have the right to receive the personal data concerning you that you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit those data to another controller without hindrance; and
- (f) **Objection** - in certain circumstances, you have the right to object to the processing of your personal data carried out by us or on our behalf.

### 13. CONTACT US

If you would like further information on anything in this Privacy Notice, for all questions or concerns you have about your personal data, or if you think you would like to exercise any of your rights as a data subject, please contact us using the contact details at the top of this Privacy Notice.

### 14. MAKING A COMPLAINT

If you think we have not complied with the requirements of the GDPR as it applies to your personal data, you have a right to lodge a complaint with any data protection supervisory authority in the EU. One such Supervisory Authority is the ICO The Information Commissioner's Office (ICO) in the UK: [casework@ico.org.uk](mailto:casework@ico.org.uk) or 0303 123 1113 / +44 1625 545 700; [www.ico.org.uk](http://www.ico.org.uk).<sup>1</sup>

You can find details of all EU Supervisory Authorities here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

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<sup>1</sup> Please note these details are subject to change outside our control, so please check online for up-to-date contact information.