

Accountabl Privacy Policy

1. Introduction

This policy applies to your use of:

- Accountabl mobile application software (“**App**”) once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (“**Device**”)
- Accountabl website (“**Website**”) accessible via <https://accountabl.eco> and online web applications (“**Expense Portal**”) accessible via <https://accountabl.expense.eco>
- Any of the services accessible through the App or Expense Portal or which we otherwise agree to provide to you or your employer through any third-party software or application (“**Services**”)

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. The App, Portal and Website are not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

2. Who we are

We are Expensmate Limited, trading as Accountabl (CRN: 12384812) (“we”, “us” or “our”). We are responsible for the App, Expense Portal and Website and we are the controller in respect of all personal data collected via the Services. We are registered as a controller with the Information Commissioner’s Office and our registration number is: ZA743843.

3. Contact details

We will be happy to deal with any queries or requests regarding the data we hold about you.

You can contact us by:

- Email: support@accountabl.eco
- Post: Data Compliance Officer, 2 Humber Quays, Wellington Street, Hull, HU1 2BN
- Telephone: 01482 386 666

You have the right to make a complaint at any time to the Information Commissioner's Office (“**ICO**”), the UK supervisory authority for data protection issues, if you have any concerns with regard to the way in which we have processed your personal data.

4. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 9th June 2022. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

5. Third party links

Our App, Expense Portal and Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact and Location Data. Please check these policies before you submit any personal data to these websites or use these services.

6. Third Parties

Ordinarily, we will be the party collecting your information directly from you. However, there may be situations where this information is obtained by us from third parties. Examples of this would include:

- Directly from a third party – e.g.
 - credit reference agencies
 - data providers for business development
- From a third party with your consent- e.g.,
 - your bank or building society
 - professional body
- From a third-party data profiling company, where you have given your consent for that company to pass such information on to us from publicly available sources – e.g.,
 - Electoral Roll,
 - Companies House,
 - HM Land Registry
 - Government VAT checker

Sharing data with third parties including our service providers and suppliers;

We will never sell or rent our customer data to other organisations for marketing purposes. We will not sell, distribute or lease your personal information to third parties for their control unless we have your permission or another lawful basis to do so (e.g., our legitimate interests (so long as our interests are not overridden by the impact on you), a contractual obligation to you or a legal requirement to do so). Where we do seek your permission, we will name the relevant third party at the time we seek such permission from you and any such permission shall be limited to that third party. Please note that we may provide information for processing to certain third parties as outlined in the following paragraph and also in section 9 below.

In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include:

- The Accountabl app (available through the Apple Store and Google Play Services)
- The ERP ecosystems for customer management (available through Hubspot.)
- We may also appoint third party data profiling companies to (on our behalf) establish trends and other buying/profile data to the extent that we're lawfully able to do so.

Accountabl only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service

providers relating to data protection and security, which mean they are only authorised by us to use your data to provide services to Accountabl and to you, and for no other purposes.

6. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data (for example, first name, last name, username or similar identifier, marital status, title, date of birth, gender)
- Contact Data (for example, address, email address and telephone numbers)
- Financial Data (for example, your Accountabl card or other Accountabl account details)
- Transaction Data (for example, information regarding purchases made using your Accountabl card or other Accountabl account, information from your accounting package regarding your purchase ledger and sales ledger if authorised by you)
- Device Data (for example, the type of mobile device you use, a unique device identifier, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device, mobile network information, your mobile operating system, the type of mobile browser you use and time zone setting)
- Content Data (for example, information stored and uploaded onto the App, Expense Portal, or Website)
- Profile Data (for example, your username and password, preferences, feedback and survey responses)
- Usage Data (for example, details of your use of the App, Expense Portal, and Website)
- Marketing and Communications Data (for example, your marketing preferences)
- Location Data (for example, your current location disclosed by GPS technology)

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

7. How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This includes information (including Identity, Contact, Financial, and Marketing and Communications Data) you give us when downloading, accessing and using the App, logging in to the Expense Portal, visiting the Website, using our Services and by corresponding with us (for example, by email). If you contact us, we may keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you use the App, Expense Portal, or Website we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies.
- **Location Data.** We also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings.
- **Information we receive from other sources including third parties and publicly available sources.** We may receive personal data about you from various third parties such as your employer and from analytics providers such as Google.

8. How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing
- Where we need to perform a contract we are about to enter or have entered with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

Purposes for which we will use your personal data

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Financial Device	Your consent
To register as a user on the Expense Portal.	Identity Contact Financial Device	Your consent
To deliver Services to you	Identity Contact Financial Transaction Device Marketing and Communications Location	Your consent Performance of a contract with you Necessary for our legitimate interests
To manage our relationship with you including notifying you of changes to	Identity Contact	Necessary for our legitimate interests (to keep records

the App, Expense Portal, , Website or any Services	Financial Profile Marketing and Communications	updated and to analyse how customers use our Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
To enable you to participate in a prize draw, competition or complete a survey	Identity Contact Device Profile Marketing and Communications	Your consent Necessary for our legitimate interests (to analyse how customers use our Services and to develop them and grow our business)
To administer and protect our business and the App, Expense Portal, and Website including troubleshooting, data analysis and system testing	Identity Contact Device	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To monitor trends so we can improve the App, Expense Portal, Website and Services	Identity Contact Device Content Profile Usage Marketing and Communications Location	Necessary for our legitimate interests (to improve the App, Portal and Website and grow our business)

9. Disclosures of your personal data

We may share personal data about you:

- with third parties who are directly involved in dealing with any request or enquiry made by you (for example, we may share your personal data with Quantum Card Services Limited and PayrNet Ltd in order to enable you to make purchases using your Accountabl card or other Accountabl account);
- where such disclosure is required by law;
- with third parties who are providing us with professional advice;
- where the disclosure is in connection with any criminal investigation, legal proceedings or prospective legal proceedings where permitted by law;
- where the disclosure is in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- where we are required to enforce our Terms of Use; or
- where we have stated or informed you otherwise (e.g. in this policy or on our Website).

We will not pass on your information to any third party for the purpose of marketing.

We may also disclose your personal data to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with

them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

10. International transfers

If we are required to transfer your personal data out of the European Economic Area (**EEA**), we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Your personal data will be transferred to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

11. Data security

All information you provide to us is stored on our secure servers. You are responsible for keeping your password and username for the App and Portal, and any other login details relating to any Accountabl account, confidential. We ask you not to share a password with anyone.

Once we have received your personal data, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

12. Data retention

We only retain your personal data for as long as we need it for the purpose for which it was collected. Whilst taking in to consideration our legal obligations, we will on an ongoing basis: review the length of time we retain your personal data; consider the purpose or purposes for which we hold your personal data for in deciding whether (and for how long) to retain it; securely delete your personal data if it is no longer needed for such purpose or purposes; and update, archive or securely delete your personal data if it goes out of date. For further information on how long we retain your personal data please contact us using the contact details set out above.

13. Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction of your personal data.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data.** This is where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

14. Cookies

The App, Expense Portal and Website use “cookies” to ensure you receive the best possible visitor experience. Cookies are small files which are sent by a web server to an individual’s computer which are then stored on that computer’s hard drive. A cookie contains text and is like an identification card which can only be translated by the server it originated from.

Cookies cannot tell us information such as your email address, which we can only collect where you tell us, for example if you submit an enquiry to us. Most internet browsers allow you to prevent cookies being stored on your computer. Alternatively, you may be able to configure your browser to accept all cookies or to notify you when a cookie is offered by our server. You may also be able to delete all cookies currently stored on your web browser. For more detailed information on the cookies we use and the purpose for which we use them see our Cookie Policy.

We may also collect information about where you are on the Internet (e.g. the URL you came from, IP address, and domain types like .co.uk and .com), your browser type, the country where your computer is located, the pages of our website that were viewed during your visit and any search terms that you entered on our website. We will use this information to administer our website, for internal operations (including troubleshooting, data analysis, testing, research, statistical and survey purposes) and as part of our efforts to keep our website safe and secure.

For further information about cookies and how they are used, please visit www.aboutcookies.org.