

MANIGO SERVICES LTD

Privacy Policy

May 2024

Introduction

This privacy policy tells you what to expect when Manigo Services Ltd collects and uses information about individuals, specifically when you are using our in-app services. In-app data collection and storage involves personal information related to your App profile, which you voluntarily give us either upon sign-up or through continued use of the App, which we will call 'personal data' in this privacy policy.

To help you understand how we use personal data across the Manigo Services Limited, in this privacy policy we explain some of the activities we undertake and explain how we may use the personal data that we collect to carry out these activities. We also provide information about your rights and how to contact us if you have any questions.

Manigo Services Ltd values user privacy.

We would like to inform you about the management of your personal data in accordance with Art. 13, 14 General Data Protection Regulation (GDPR), as well as the Data Protection Act (DPA 2018). For the purpose of data protection legislation, the data controller is Manigo Services Ltd, Level 39 - One Canada Square, London, E14 5AB. We are registered as a Data Controller in the UK with the Information Commissioner's Office (ICO), registration number **ZA214276**.

Monavate Limited is the issuer of the card associated with your e-wallet account. As such, Monavate is a controller of some of your personal information as it relates to, and is required for, the administration and operation of the card. Monavate is authorised and regulated as an Electronic Money Issuer with the Financial Conduct Authority with Firm Reference Number 901097.

Please note that this privacy policy does not govern the collection and use of information by companies that Manigo Services Ltd does not control, nor by individuals not employed or managed by Manigo Services Ltd. If you visit any Web site the link to which is provided by Manigo Services, be sure to review the privacy policy on the specified Web site before providing the site with any personal information

Types of Data we collect

- Account registration. You can provide us with your name, address, DOB email, nationality when registering an account.
- Location data and Demographic data. Includes internet protocol (IP) address, and location, country, state, city, zip code, time zone;
- Image Collection. You provide us with a self-generated moving image when registering an account, and you scan a copy of a current government-issued photo ID.
- Device data. Includes model, OS version, language;
- Usage Data. Includes information about how you use our app, user activity within the application, app event;
- Access to your camera, files, and folders are placed on your device — access to the gallery.
- Financial information. Includes information about merchant name, expense category, expense date, expense description, expense amount, report name, report currency, number of expenses in the report, report amount, expense receipt photo.

What we do with your personally identifiable information

It is always up to you whether to disclose personally identifiable information to us via the Manigo App (In App), although if you elect not to do so, we reserve the right not to register you as a user or provide you with any products or services.

“In App Personally identifiable information” means information that can be used to identify you as an individual, such as, for example:

- your name, email address, phone number, residence address, information collected during registration: date of birth, images collected for the liveness check, contacts;
- Information relating to your scanned government-issued photographic ID – e.g. passport or driver’s license numbers.
- user account ID, financial, payment, purchase history information associated with the account, app information and performance (crash logs), diagnostics, device ID, data usage and handling
- show your profile picture in the app if you add one;
- show your profile picture and or name to Manigo contacts in their app if you have not turned off your profile privacy settings. (If you pay someone, they’ll see your name regardless. It’s our legal duty to show this, so you can’t opt out);

If you do provide personally identifiable information to us, either directly or through a service provider or other business partner, we will:

- not sell or rent it to a third party without your permission — although unless you opt out (see below), we may use your contact information to provide you with information we believe you need to know or may find useful, such as (for example) news about our services and products and modifications to the Terms of Service;

- take commercially reasonable precautions to protect the information from loss, misuse and unauthorized access, disclosure, alteration and destruction;
- not use or disclose the information except:
 - as necessary to provide services or products you have ordered, such as (for example) by providing it to a carrier to deliver your Manigo Card;
 - in other ways described in this privacy policy or to which you have otherwise consented;
 - in the aggregate with other information in such a way so that your identity cannot reasonably be determined (for example, statistical compilations);
 - as required by law, for example, in response to a subpoena or search warrant;
 - to outside auditors who have agreed to keep the information confidential;
 - as necessary to enforce the Terms of Service;
 - as necessary to protect the rights, safety, or property of Manigo Services Ltd, its users, or others; this may include (for example) exchanging information with other organizations for fraud protection and/or risk reduction.

Other information we collect

We may collect other information that cannot be readily used to identify you. We may use this information, individually or in the aggregate, for technical administration of our services; research and development; customer and account administration; and to help us focus our marketing efforts more precisely.

Cookies

Manigo Services Ltd uses “cookies” to store personal data on your computer. We may also link information stored on your computer in cookies with personal data about specific individuals stored on our servers. If you set up your Web browser (for example, Internet Explorer or Firefox) so that cookies are not allowed, you might not be able to use some or all of the features of our Website(s).

For more information, please see our [Cookies Policy](#). For further definition of the cookies, please visit www.allaboutcookies.org.

Where we store your personal data

Information you provide when you apply or sign up for the App, go through our identity or account verification process, authenticate into your account, communicate with us, answer our questions, or otherwise use the App or the website www.manigo.com is stored on secured servers provided by third party hosting vendors.

The data that we collect from you may be transferred to and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or one of our suppliers. Prior to transmission of your information outside the EEA, we will ensure that adequate measures are in place to ensure the security of your data which are equal to EEA standards in accordance with this policy.

Manigo works closely with third parties in order to help deliver services to you. These third parties are business partners, technical sub-contractors, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies and fraud prevention tools. Information we may collect about you from such parties can include credit search information, information which helps us to conduct checks and help us verify your identity and the identity of any other cardholder. This allows us to comply with “know your customer”, anti-money laundering and other legal requirements which are aimed at detecting and preventing financial crime.

These suppliers are (but not limited to):

- Sum & Substance Limited (“SumSub”)
- ComplyAdvantage
- Monavate Limited
- Paymentology
- Cash Flows

Manigo Services Ltd are required by law to retain certain personal data and information for a minimum of at least 5 years from the date of the last In App transaction you make for example.

Your privacy responsibilities

To help protect your privacy, be sure:

- not to share your user ID or password with anyone else;
- to take customary precautions to guard against “malware” (viruses, Trojan horses, bots, etc.), for example by installing and updating suitable anti-virus software.

Your data protection rights

You have rights under data protection laws in relation to your personal data. You have the right to:

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.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected; however, 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. Please be aware that we may not always be able to comply with your request of erasure for legal reasons which you will be advised of at the time of your request. Manigo are required to retain certain information for a minimum of 5 years, this requirement supersedes any right to erasure requests under applicable data protection laws.

Object to processing of your personal data. This is in situations 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 information for direct marketing purposes. In some cases, we may be able to show that we have compelling legitimate grounds to process your information which override your rights. Due to regulatory requirements, Manigo has numerous obligations to process and retain certain personal information for compliance purposes, these requirements supersede any right to objection requests under applicable data protection laws. If you object to the processing of certain personal information, we may not be able to provide you with our services and it is likely we will have to terminate your account.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Please be aware that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel your use of our Services but we will notify you if this is the case at the time.

Withdraw consent at any time 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. Please be aware, if you withdraw your consent, we may not be able to provide our Services to you and we will advise you of this following receipt of your request.

Should you wish to exercise any of your rights, please contact us at dpo@manigo.com.

Data subject access requests (DSAR)

Should you wish to make a DSAR, please contact dpo@manigo.com outlining what data you are requesting, and the reason for your request. You will not have to pay a fee, however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints:

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Information collected from minors

You must be at least 18 years old to use MANIGO's Website and In App services. Manigo Services Ltd does not knowingly collect information from minors under 18.

Other information we may use

Manigo Services Ltd offers the ability to make in-app peer-to-peer payments and in-app chat messaging to other Manigo members. To use both these functions we will require access to your phone contacts database. Before we access your phone contact database your permission will be requested. Manigo Services Ltd does not store your phone contact database on our servers.

Changes to this privacy policy

We reserve the right to change this privacy policy as we deem necessary or appropriate because of legal compliance requirements or changes in our business practices. If you have provided us with an email address, we will endeavour to notify you, by email to that address, of any material change to how we will use personally identifiable information.

Questions or comments?

If you have questions or comments about Manigo Services Ltd privacy policy, send an email to dpo@manigo.com, or contact us via any of the ways described in the Contact Us page at www.manigo.com