

# Privacy Policy

Last updated 15th May 2025

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## About Us

Clay Technologies UK Limited operates under the trading name “Kravings”. We are a company incorporated in England and Wales with company number 15449195, and our registered office address is 30 Churchill Place, Canary Wharf, London, E14 5RE.

We are listed on the Information Commissioner's Office (ICO) Data Controllers Register under registration number ZB655337. In addition, we are authorised and regulated by the Financial Conduct Authority (FCA), with firm reference number 1017010.

You can reach us:

- **By Live Chat:** Tap the chat button inside the app to start a conversation.
- **By mail:** Kravings, PO Box 1289, Uxbridge, UB8 9PS
- **By email:** [hello@kravings.com](mailto:hello@kravings.com)
- **By phone:** 0333 038 2429

If you need to contact our Data Protection Officer, please do so via email at [dataofficer@clay.so](mailto:dataofficer@clay.so).

## How do we collect Personal Information

We gather personal data about you through the following methods:

- **Direct interactions** – when you complete forms on our website or mobile applications, manage your loan online, or communicate with us via email, phone, live chat, or other channels;
- **Usage data** – by monitoring how you engage with our products and services. This includes interactions with our mobile app and website, as well as how you handle your Kravings account. We may record events such as the timing and method of your loan application submission;

- **Third parties with your consent or other legal grounds** – from external organisations that either have your permission to share your data with us or are allowed to do so for specific purposes under a lawful basis. This may be in connection with direct marketing activities or evaluating your eligibility for a product offered by one of our partners;
- **Publicly available sources** – such as the Companies House register, the Individual Insolvency Register, or the 'Open Register' section of the electoral roll. These sources may also be used for activities like locating you if you've changed address and we need to collect an outstanding balance;
- **External data providers** – including Credit Reference Agencies, Fraud Prevention Agencies, and Account Information Service Providers. Credit Reference Agencies, for example, supply details about your financial conduct — often referred to as your credit history — including how you've managed credit agreements like mortgages, personal loans, overdrafts, credit cards, mobile contracts, and utility bills.

## What Types of Personal Information We Collect

We collect a range of personal data at the outset and throughout your relationship with us. We only gather and use what is necessary to meet the objectives outlined in this notice.

It's important that any information you provide is truthful, accurate, up to date, and not misleading.

The types of personal information we may collect include:

- Basic identification details such as your full name, current and previous addresses, phone numbers, email address, date of birth, employment information, and homeownership status;
- Financial and account-related data, including your bank account details and transaction history;
- Open banking information you have given us permission to access;
- Demographic and lifestyle characteristics;
- Data sourced from Credit Reference Agencies, Fraud Prevention Services, and Account Information Service Providers. This information may be collected both when you initially enquire about a loan and during the course of managing your account;
- Information about your current and past loans with us;

- Records of any interactions we've had with you;
- Information on how your loan application was submitted (such as the browser or device used);
- Details of all communications between you and our team, whether by phone, email, or other means;
- Insights gathered from customer surveys or feedback forms.

In certain cases, we may also collect and handle sensitive personal data where necessary—for instance, to ensure our services are inclusive and that we're able to provide you with the right level of support.

## **How We Use Your Personal Data**

We may process your personal information for a variety of purposes, including:

- To handle and complete your loan application;
- To carry out checks with Credit Reference and Fraud Prevention Agencies;
- To make initial lending decisions and assess whether you're eligible for further credit;
- To establish payment arrangements and help protect against fraud;
- To interact with you throughout the loan application and agreement process, and to respond to any questions, concerns, or complaints you raise;
- To keep our records accurate and ensure your account details remain up to date;
- To present you with products or services that may be relevant to your needs, where you've given us permission to contact you. This could involve periodic checks with Credit Reference Agencies;
- To review and enhance how our website looks and functions, so it works as effectively as possible for you;
- To support and enhance our internal systems, including testing, improving, and maintaining them;
- To locate you if we lose contact;

- To pursue repayment of outstanding balances;
- To meet our legal and regulatory responsibilities;
- For any specific purpose we tell you about at the time your information is gathered;
- To save time by auto-filling parts of our website when you revisit and log in as a returning customer;
- To support our internal analysis and business development efforts, including marketing campaigns, product development, and advertising effectiveness.

We may also monitor and record our communications with you — such as calls, emails, live chat, and SMS messages — for purposes including security, training, service quality, fraud detection, and identifying customer vulnerabilities.

If we are unable to offer you a loan directly, we may, with your consent, check your eligibility for loans or credit products from our panel of trusted lenders and brokers. Our partners use soft credit searches that do not impact your credit score.

## **Why do we process your personal information?**

We collect and process your personal data when it's necessary to support our legitimate business operations. The legal bases we rely on to do this include:

### **Contractual necessity**

We may handle your personal data when it is necessary to establish or fulfil a contract with you. This can include:

- evaluating your eligibility for our products and services;
- sharing relevant details with Credit Reference Agencies, Fraud Prevention Agencies, and Account Information Service Providers to assess your credit profile;
- reviewing your suitability for other financial products, including new lending options, which may involve periodic checks with Credit Reference Agencies;
- delivering and managing our services, including:
  - creating your account;
  - confirming your contact information;

- sending you required documents and formal notices;
- releasing funds and managing payments;
- applying interest, fees, and charges to your account;
- sending you legally mandated updates and service notices;
- collecting any amounts owed;
- addressing questions or concerns raised by you or someone acting on your behalf.

## **Legal obligation**

We may process your personal information where required by law. This could involve:

- verifying your identity;
- identifying, investigating and reporting suspicious activity to comply with anti-money laundering, financial crime and sanctions obligations;
- assessing your ability to afford the credit you apply for;
- fulfilling our duties to detect and prevent financial crime;
- retaining business records in accordance with legal requirements;
- meeting obligations to disclose information for tax reporting purposes to national authorities;
- responding to regulatory enquiries or information requests from bodies such as the Financial Conduct Authority or the Information Commissioner's Office;
- producing reports required by regulators;
- ensuring we meet the requirements of all applicable legislation, regulations, and professional standards. This may include sharing your data with other entities within the Clay Technologies UK Limited group;
- supporting vulnerable customers by offering suitable help and protection where necessary.

## **Legitimate interest**

We may also process your personal data where we have a commercial or operational need to do so, provided it does not unfairly impact your rights. Examples include:

- developing new offerings across Clay Technologies UK Limited group companies and identifying products or services that may be suitable for you;
- contacting you about those offerings where we have appropriate permission, including for a reasonable period after your relationship with us ends;
- using data to carry out analytics, modelling, and profiling — for example, to develop credit or fraud models, assess customer vulnerability or financial risk, forecast losses, and analyse market trends. We may also share this data across Clay Technologies UK Limited group companies;
- improving the design and usability of our website and understanding how our products and services are being used;
- enhancing and maintaining our internal systems, including testing and upgrades;
- sharing your details with organisations that referred you to us under a commercial agreement;
- evaluating your creditworthiness (including through sharing data with other Clay Technologies UK Limited entities);
- recovering outstanding balances;
- assigning debts to other companies;
- sharing information with third parties to help prevent fraud and financial crime;
- securing funding to support our lending products.

## **Who We May Share Your Personal Data With**

In order to deliver our services, we may engage third-party organisations to act on our behalf. These partners may require access to and processing of your personal data. They can include:

- Credit Reference Agencies;
- Fraud Prevention Agencies, including CIFAS;

- Account Information Service Providers;
- Providers of communication services such as mail, email, phone, live chat, and SMS messaging;
- Debt Collection Agencies, Debt Management Companies, and other firms involved in asset recovery, reconnection services, and field visits;
- Debt purchasers;
- Companies conducting customer surveys to gather feedback and enhance our services;
- IT service vendors;
- Cybersecurity and debugging providers for improving system security and reliability;
- Legal professionals and advisors;
- Providers of digital and direct marketing services;
- Third-party firms conducting quality assurance checks;
- Payment processing partners;
- Trusted lenders and broker partners assessing your eligibility for credit;
- Any prospective buyers of your account;

Additionally:

- **GoCardless** is used to handle Direct Debit collections. You can read how they handle your data and your associated rights at: <https://gocardless.com/legal/privacy/>
- **Pepper Advantage** is our loan servicing partner and may access your personal information in order to manage your loan account on our behalf. This includes handling collections, customer service, and other operational activities related to the administration of your loan. You can find out more about how Pepper Advantage processes your personal data in their privacy notice at: <https://www.pepper-advantage.com/pepper-advantage-privacy-policy>.
- Other affiliated companies within the Clay Technologies UK Limited group may access your information, for example to support product delivery, service improvement, or internal reporting.

We may also share your data with external analytics and AI technology providers, who assist us in managing risk, enhancing our services, and conducting statistical assessments. These insights may be shared within the Clay Technologies UK Limited group and its affiliates.

## **Transferring Your Personal Data Outside the UK and EEA**

In order to provide our services, we or our third-party partners may need to transfer your personal data to countries outside the United Kingdom or the European Economic Area (EEA). These countries may not have the same level of data protection as required under UK or EEA law.

Whenever such transfers occur, we ensure that appropriate safeguards are in place to protect your personal data in accordance with applicable data protection legislation. These safeguards may vary depending on the nature of the transfer and the recipient organisation, but often include the use of the EU Commission's Standard Contractual Clauses.

If you would like more information, please email us at: [hello@kravings.com](mailto:hello@kravings.com).

## **How We Work with Credit Reference Agencies**

As part of processing your application, we will carry out credit and identity checks using one or more credit reference agencies (CRAs). If you become a customer, we may also conduct ongoing CRA checks to help manage your account.

To do this, we will share your personal data with CRAs, who will return information about you. This can include details from your credit application, your financial circumstances, and your credit history. CRAs provide both public records (e.g. electoral roll) and shared financial data, including credit commitments and fraud prevention records.

The information we receive from CRAs helps us to:

- determine your creditworthiness and assess whether you can afford the product;
- verify the accuracy of the information you've given us;
- help prevent financial crime, fraud, and money laundering;
- manage your loan account with us;
- trace and recover overdue payments; and
- ensure any offers we present are appropriate to your circumstances.

We will continue to exchange information with CRAs throughout your relationship with us. This includes account performance, such as whether repayments are made on time, if you settle early, or if you fall behind. CRAs may share this information with other lenders.

When we run a CRA check, it may leave a visible “footprint” on your credit report that can be seen by other organisations.

If you are financially linked to someone (e.g. a spouse or joint applicant), your records may be connected. You should let them know before applying, as CRAs may associate your records with theirs. These links will stay in place unless you or your financial associate requests and completes a disassociation with the CRA.

The three main CRAs we use are:

- **TransUnion** – <https://www.transunion.co.uk/crain>
- **Experian** – <https://www.experian.co.uk/crain>
- **Equifax** – <https://www.equifax.co.uk/crain>

Each of these links takes you to the same CRAIN (Credit Reference Agency Information Notice) document, which explains how CRAs use and share data, how long they retain it, and your rights under data protection law.

## **How We Work with Fraud Prevention Agencies**

We may share the personal data you’ve provided with fraud prevention agencies. These agencies use the information to detect and prevent fraud, combat money laundering, and confirm your identity.

If fraudulent activity is identified, it may result in you being denied access to certain services, financial products, or employment opportunities.

For more information on how your data is used by us and these agencies — and to understand your rights under data protection laws — you can review the Fair Processing Notices provided by CIFAS.

## **How We Use Account Information Service Providers**

We use services provided by Plaid Inc., Plaid Financial Ltd., and Plaid B.V. (together referred to as “Plaid”) — available at [www.plaid.com](https://www.plaid.com) — to enable you to securely share information from your payment accounts with us and with other selected providers.

To use this service, you’ll be asked to accept Plaid’s Terms of Service and either enter your account credentials directly with Plaid or, if using Open Banking, be redirected to your bank to

complete authentication. Plaid's Terms of Service outline the conditions under which they access and transmit your payment account data to us.

Plaid is authorised by the Financial Conduct Authority in the UK to deliver account information and payment initiation services (Firm Reference Number: 804718). It is also subject to UK and EU data protection laws, and is required to handle your personal information in line with those regulations, as well as Plaid's own Terms of Service and Privacy Policy.

In addition to Plaid, we may obtain Open Banking data from other approved third-party providers. This can include transaction data and account details from your financial institutions.

## **How to Update Your Marketing Preferences**

When we collect your personal data, you'll have the option to set your marketing preferences.

You can also update your preferences at any point by:

- Logging into your account at [kravings.com](https://kravings.com) and adjusting your settings;
- Going to the Profile section within the Kravings mobile app;
- Emailing us at [hello@kravings.com](mailto:hello@kravings.com); or
- Using the Live Chat feature in the Kravings app.

## **What Are Your Rights Regarding Your Personal Data?**

As a data subject, you have several rights under data protection law, including:

- The right to access the personal information we hold about you;
- The right to correct inaccurate or incomplete personal data;
- The right to request deletion of your personal data;
- The right to request that we restrict or suppress the processing of your data;
- The right to receive and reuse your personal data across different services (known as "data portability");
- The right to object to the processing of your data in certain situations;
- Rights related to automated decision-making, including profiling; and

- The right to withdraw your consent at any time. In some cases, we may require your consent to process your data. If so, we'll always ask for it upfront. If you change your mind later, you can withdraw your consent at any point.

These rights may be limited by legal and regulatory obligations. Financial organisations like Kravings must retain certain information for purposes such as responsible lending and financial crime prevention. For example, repayment data reported to Credit Reference Agencies may be retained for up to six years from the date your loan is closed. If your loan is marked as defaulted, that information is kept for six years from the date of default and may be retained longer where necessary to establish, exercise, or defend legal claims.

If you believe any personal data we hold about you is inaccurate or incomplete, you can ask us to correct it.

We do not charge a fee to process your rights requests unless they are clearly unfounded, excessive, or repetitive. If you wish to exercise any of your rights, you can make a request by:

- Calling us on **0333 038 2429**, or
- Emailing us at **hello@kravings.com**

We'll review your request and inform you if we are unable to act on it or need to apply any limitations, along with our reasons.

You also have the right to lodge a complaint with the UK's data protection authority, the Information Commissioner's Office (ICO). Their address is: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

You can contact them by phone at **0303 123 1113** (local rate) or **01625 545745**, or file a complaint online at: <https://ico.org.uk/make-a-complaint/>

### **'Special Categories' of Personal Data**

As a general rule, we do not request any personal data that falls under the 'special categories' classification — also known as sensitive personal data. This includes information relating to your:

- Political opinions
- Racial or ethnic background
- Religious or philosophical beliefs
- Trade union membership

- Genetic or biometric data
- Physical or mental health
- Sex life or sexual orientation

However, in certain situations, we may need to process health-related information if it is relevant to offering you additional support — for example, where adjustments are needed in how we communicate with you or deliver our services.

We may also work with specialist third-party partners who help us identify and assist vulnerable customers. These partners may collect or process health-related data as part of customer reconnection or welfare support activities.

Any such processing will only take place where it is necessary to meet our legal obligations to support vulnerable individuals or to establish, exercise, or defend legal claims.

## How Long We Keep Your Personal Information

We keep your personal data for as long as necessary to meet our legal and regulatory obligations. Where no specific rules apply, we will not retain your data for longer than is required for our legitimate business purposes.

In most cases, this means we will retain your information for up to six years after our relationship with you ends. However, we may keep it for a longer period if needed to establish, exercise, or defend legal claims.

In some instances, we may retain anonymised data for extended periods for analysis and statistical reporting — this data will no longer identify you.

## How We Protect Your Information

We rely on leading cloud service providers that follow recognised industry security standards and best practice frameworks to safeguard your personal data.

## How We Use Automated Decision-Making

We may use automated processes to make decisions about you based on your personal data. You have the right not to be subject to decisions made solely through automated means if those decisions have a legal or similarly significant effect — except in certain permitted circumstances.

We use automated decision-making in the following areas:

- **Creditworthiness and affordability checks:** We analyse data you provide through online forms, your usage of our services, and data from Credit Reference Agencies and other third parties to assess your eligibility and ability to afford the product you've applied

for. If you disagree with the outcome, you have the right to request a manual review. We may ask you to supply further information before conducting a human-led review.

- **Fraud and money laundering risk detection:** If our systems identify behaviour that aligns with fraudulent or money laundering activity — or if there are inconsistencies with previously provided information, or signs of identity concealment — we may determine there is a risk of fraud or money laundering.
- **Profiling for product suitability:** We may use profiling to assess whether our products or services are appropriate for you and to keep you informed of relevant options. This also includes evaluating the suitability of existing customers for new products and supporting marketing decisions made alongside our partners.
- **Actioning arrears:** We may use automated processes to decide how to respond when your account falls into arrears or default. You have the right to request a manual review of such decisions.

## How We Link to Other Websites

Our website may include links to external websites that are not operated or controlled by us. We recommend that you carefully review the privacy policies of any third-party site you visit before using it or sharing any personal information.