

Privacy & Cookie Policy of Payaca

WHO WE ARE

Payaca Limited is a company registered in England and Wales (company number 11173058) with a registered office at Unit 14 Greenway Farm, Bath Road, Wick, Bristol, Gloucestershire, BS30 5RL.

When you use our services, you'll share some information with us. We want to be upfront about the information we collect, how we use it, who we share it with and the choices we give you to control, access and update your information. For the purposes of data protection legislation, we are the data controller of your personal data. We are registered with the Information Commissioners Office in the UK with reference number ZA426301.

Please read this privacy and cookie policy carefully.

Questions, comments and requests regarding this privacy policy are welcomed and should be sent to us at: privacy@payaca.com

SUMMARY

- We keep to a minimum the information we hold about you
- We use your data to provide our services to you, respond to your enquiries, manage our relationship with you, meet our legal obligations, and improve our website
- We delete your data when it is no longer needed for these things
- Generally, we do not give your information to third parties, but there are some exceptions
- You have lots of privacy rights
- We take security seriously
- We are happy to answer your questions about any of this

THE PERSONAL INFORMATION WE COLLECT AND USE

We ensure that your privacy is respected at all times and our primary goal is to improve upon and make sure our services and messaging are relevant for all our users, while also ensuring that personal information of all users is respected and protected.

To learn about the information we collect and how we use your personal data, read the notice or notices which apply best to your relationship with us:

- I have a membership with you as a tradesperson (**Membership Holders**)
- I have been sent an invoice or a quote by a tradesperson (**Customers**)
- I am applying for finance through the platform (**Borrowers**)

COOKIES

Our website uses cookies. Cookies are pieces of code that allow small amounts of information to be passed from your internet browser to our web server. We use third party cookies, serving several purposes. All data passed by cookies is anonymous and will never contain your name, address, telephone number or payment details.

They enable us to:

- Estimate our audience size and usage pattern

- Store information about your preferences, and so allow us to customise our site according to your individual interests
- Speed up your searches
- Recognise you when you return to our site

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org.

SHARING AND TRANSFERRING YOUR PERSONAL INFORMATION

We may share your information or data with trusted third parties who help us provide certain aspects of our services. In particular, we engage third parties to:

- facilitate the sending of any email to Membership Holders and Customers
- facilitate Membership Holders and Customers in making credit card payments
- help us track website conversion success metrics
- manage our sales and customer support services to you (e.g. e-mail or live chat)
- log any errors and issues with our website

We enter into confidentiality and data processing terms with our partners to ensure they comply with high levels of confidentiality and best practice in privacy and security standards and we regularly review these standards and practices.

We also have to share information or data in order to:

- meet any applicable law, regulation, legal process or enforceable governmental request
- enforce applicable policies, including investigation of potential violations
- detect, prevent, or otherwise address fraud, security or technical issues
- protect against harm to the rights, property or safety of our users, the public or to us and/or as required or permitted by law

We will not transfer your personal data outside of the EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

If you would like further information about who we share your personal information with, please contact us.

RETAINING YOUR PERSONAL INFORMATION

We will hold on to your information for as long as is needed to be able to provide the services to you.

We may also keep hold of some of your information if reasonably necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

CONTROL OVER YOUR PERSONAL INFORMATION

Under the General Data Protection Regulation, you have a number of important rights available to you for free. In summary, those include rights to:

- be informed about how your personal information is being used (hopefully this privacy policy explains it all)
- access the personal information we hold about you
- request that we port elements of your data to another service provider
- request us to correct any mistakes in your information which we hold
- request the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured format
- stop any direct marketing which you can do through your account or the unsubscribe links at the bottom of emails
- object to decisions being taken by automated means concerning you or significantly affect you

For further information on each of these rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of these rights, please:

- email us at privacy@payaca.com
- let us have information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill)
- let us know the information to which your request relates.

OPTING OUT

You can ask us to stop sending you marketing messages at any time by logging into your account and adjusting your marketing preferences or by following the opt-out links on any marketing messages sent to you.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us which we need in order to supply our services to you.

HOW TO COMPLAIN

We hope that we can resolve any query or concern you raise about our use of your information. If you are not happy with how we manage your personal data, you have the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>.

CHANGES TO THIS PRIVACY POLICY

This privacy policy was published on 13th July 2018 and last updated on 18th November 2019.

Any changes we make to this notice will be posted on this page.

HOW TO CONTACT US

Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us please send an email to privacy@payaca.com.

Privacy Policy: Membership Holders

SUMMARY

This page sets out what information we process when you hold an account with us as a tradesperson.

WHAT PERSONAL INFORMATION WE HOLD

Contact information: when you register for an account we collect your first and last name, username, password, email address and phone number.

Usage information: we collect usage information about you whenever you interact with our websites and services. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, and so on.

Device and browser data: we collect information from the device and application you use to access our services. Device data mainly means your IP address, operating system version, device type, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

Log data: our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type and timestamps.

Information from page tags: we use third party tracking services that employ cookies and page tags to collect data about visitors to our websites. This data includes usage and user statistics. Emails sent by us or by users through our services include page tags that allow the sender to collect information about who opened those emails and clicked on links in them.

Billing information: we require you to provide your billing details, a name, address, email address and financial information corresponding to your selected method of payment (e.g. a credit card number and expiration date or a bank account number). We use a third party payment gateway to collect, store and process billing information. We do not store this information and all payment pages use TLS technology.

Account settings: you can set various preferences and personal details on pages like your account settings page.

HOW WE USE YOUR PERSONAL INFORMATION

We process personal data about you:

- with your consent; and/or
- to fulfil our contractual responsibility to deliver the services to you; and/or
- to pursue our legitimate interests of providing support and improving the services we offer and developing new products and service features; and/or
- to comply with a legal obligation.

Category of personal data	Purpose for processing	Legal basis for processing
Contact information	We use your contact information to: <ul style="list-style-type: none">• provide you with services.• bill you for our services.• send you product related emails including software improvements and changes, a	Fulfilment of a contract Consent Legitimate interests

	<p>welcome email and onboarding tutorials (for as long as you do not opt-out).</p> <ul style="list-style-type: none"> • provide you with customer support. • send you communications of a transactional nature (e.g. billing-related matters). • to send you our newsletter which might include non-product related information (for as long as you do not opt-out). • to ask you to carry our surveys so you can let us know how we're doing. • to enter you into competitions or prize draws. 	
Usage information	<p>We collect information about the types of content you engage with, so we can direct you to other relevant features and services we offer and help you in using our services, for example by making recommendations for you to optimise use of our services.</p>	Legitimate interests
Device and browser data	<p>We use device and browser data to troubleshoot problems with our service and to make improvements to it, or to customise the interface for that device. We also infer your geographic location based on your IP address for abuse and tax and pricing purposes.</p>	<p>Legitimate interests</p> <p>Legal requirement</p>
Log data	<p>We use log data for many different business purposes to include:</p> <ul style="list-style-type: none"> • monitoring abuse and troubleshooting. • creating new services, features, content or make recommendations. • tracking behaviour at the aggregate/anonymous level to identify and understand trends in the various interactions with our services. • fixing bugs and troubleshooting product functionality. 	Legitimate interests
Third parties and integrations	<p>We collect and use information from third parties and integration partners to:</p> <ul style="list-style-type: none"> • ensure you can sign-up to our service from a third-party integration. • personalise our services for you. • ensure you can use our service in conjunction with other services. 	Legitimate interests

<p>Information from page tags</p>	<p>We collect information from page tags to enable us to:</p> <ul style="list-style-type: none"> • understand our user behaviours. • see which features of our website are being used. • see which parts of our platform we need to develop further. • determine the success of our advertising campaigns. 	<p>Legitimate interests</p>
<p>Account settings</p>	<p>We use your account preferences to deliver a personalised service to you.</p>	<p>Fulfilment of contract</p>

Privacy Policy: Customers

SUMMARY

This page sets out what information we process when you submit personal information to us after being sent an invoice or a quote by a tradesperson

WHAT PERSONAL INFORMATION WE HOLD

Contact information: when a tradesperson sends you a quote or an invoice through Payaca, we will collect your first and last name, email address, phone number and home or work address.

Usage information: we collect usage information about you whenever you interact with our websites and services. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, and so on.

Device and browser data: we collect information from the device and application you use to access our services. Device data mainly means your IP address, operating system version, device type, system and performance information, and browser type. If you are on a mobile device, we also collect the UUID for that device.

Log data: our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type and timestamps.

Information from page tags: we use third party tracking services that employ cookies and page tags to collect data about visitors to our websites. This data includes usage and user statistics. Emails sent by us or by users through our services include page tags that allow the sender to collect information about who opened those emails and clicked on links in them.

HOW WE USE YOUR PERSONAL INFORMATION

We process personal data about you to pursue our legitimate interests of delivering an efficient service.

Category of personal data	Purpose for processing
Contact information	We use your contact information to generate a quote or an invoice.
Usage information	We use information about how you use our services to improve our services for you and all users.
Device and browser data	We use device and browser data to troubleshoot problems with our service and to make improvements to it. We also infer your geographic location based on your IP address.
Log data	We use log data for many different business purposes to include: <ul style="list-style-type: none">• monitoring abuse and troubleshooting.• creating new services, features, content or make recommendations• tracking behaviour at the aggregate/ anonymous level to identify and understand trends in the various interactions with our services

	<ul style="list-style-type: none">• fixing bugs and troubleshooting product functionality
Information from page tags	We collect information from page tags to enable us to measure the performance of our email messaging and to learn how to improve email deliverability and open rates.

Privacy Policy: Borrowers

SUMMARY

Payaca is licenced as a credit broker and not a lender. We are authorised and regulated by the Financial Conduct Authority (the **FCA**): firm reference number 811775. If you apply for finance through our platform, we will collect and process the following personal information in order to apply for finance on your behalf. We recognise that this information includes more sensitive data and therefore we apply appropriate security measures, including encryption.

WHAT PERSONAL INFORMATION WE HOLD

Contact information: when you apply for finance through Payaca, we will collect your title, names, date of birth, phone number, addresses and information necessary to verify your identity.

Financial information: we collect information including loans and credit commitments, personal credit history and monthly expenses.

Employment and remuneration information and history: this information includes salary and other additional income such as pensions and benefits.

Usage information: we collect usage information about you whenever you interact with our websites and services. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, and so on.

Device and browser data: we collect information from the device and application you use to access our services. Device data mainly means your IP address, operating system version, device type, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

Log data: our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type and timestamps.

Information from page tags: we use third party tracking services that employ cookies and page tags to collect data about visitors to our websites. This data includes usage and user statistics. Emails sent by us or by users through our services include page tags that allow the sender to collect information about who opened those emails and clicked on links in them.

HOW WE USE YOUR PERSONAL INFORMATION

We process personal data about you to pursue our legitimate interests of delivering an efficient service.

Category of personal data	Purpose for processing
Contact information	We use your contact information to apply for finance on your behalf and to verify your identity.
Financial information	We use your financial information to enable our panel of lenders to assess your application and decide whether or not they will offer you a loan.

Employment and remuneration information	We use information about your employment and remuneration to enable our panel of lenders to assess your application and decide whether or not they will offer you a loan.
Usage information	We use information about how you use our services to improve our services for you and all users.
Device and browser data	We use device and browser data to troubleshoot problems with our service and to make improvements to it. We also infer your geographic location based on your IP address.
Log data	We use log data for many different business purposes to include: <ul style="list-style-type: none"> • monitoring abuse and troubleshooting. • creating new services, features, content or make recommendations • tracking behaviour at the aggregate/ anonymous level to identify and understand trends in the various interactions with our services • fixing bugs and troubleshooting product functionality
Information from page tags	We collect information from page tags to enable us to measure the performance of our email messaging and to learn how to improve email deliverability and open rates.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We only collect information about you when you provide information to us as part of your application for a loan.

WHY DO WE PROCESS YOUR PERSONAL INFORMATION?

We will only process information that is necessary for the purpose for which it has been collected.

We may use and process this personal information where it is necessary for us to perform a contract with you for the supply of credit broking services. This includes obtaining personal loan quotes from our panel of lenders.

If your application is not successful or you decide not to go ahead with an offer made by our lender(s) then we will store your personal information in accordance with our data retention policy. We may need to process your personal information in the future provided it is in our legitimate business interest to do so and your rights are not affected. We may also process your personal information for contractual responsibilities we may owe the FCA or for wider compliance with any legal or regulatory obligation.

HOW IS YOUR PERSONAL INFORMATION USED?

- To process a loan application between you and our panel of lenders.
- To contact you about your loan application throughout the process.
- To exercise or defend our legal rights and/or to comply with any legal/regulatory requirements.
- To obtain feedback or request a review about our service once an application has been completed.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

To provide you with our credit broking services we need to share your personal information with our panel of lenders so that they can process your application. This may include carrying out searches with credit reference and fraud prevention agencies. You can obtain a list of this panel by contacting us at privacy@payaca.com.