



# Privacy Policy

## Real Technologies Limited (RT)

### Effective from 6th January 2021

Real Technologies Limited (we, our, us, RT) are committed to protecting and respecting your privacy. This Privacy Policy describes how we collect, use, process, and disclose your information, including personal information, as you use, and access the RT app or our websites. This privacy policy (Policy) is designed to help you understand what kind of personal data we collect, and how we process and use this data. It also sets out your rights in relation to how we look after your personal data.

For the purpose of the General Data Protection Regulation (GDPR) the data controller is Real Technologies Limited, registered at 115 New Bridge Street, NE1 8ST, Newcastle-upon-Tyne, England. If you have any further questions, you can reach our Data Protection Officer on [office@real-technologies.co.uk](mailto:office@real-technologies.co.uk).

### Highlights from this policy

We process data collected from you, your bank, and third parties, to make RT app work for you, and comply with regulatory obligations. In short, most importantly we use:

**Your personal details** (names, address, date of birth), to comply with our obligations to know our customer

**Your bank transaction data (but not your bank logins!)** to make RT app work, that is to give you insights and recommendations and to determine how much to save for you

**Data about your use of RT app** to help us make RT app better

We share your data with other companies to fulfil our contract with you, or comply with regulation:

**Account Aggregation Providers** (Yolt Technology Services) — who securely connect your bank account to RT app

GDPR gives you the right to see, erase, or challenge the data we hold about you (among other rights). Our support team can help with this. Read the full privacy policy for further details on how we use your information.



### **Information we collect about you**

You may give us information about yourself by accessing our websites [RT-app.io](https://rt-app.io) or [real-technologies.co.uk](https://real-technologies.co.uk) (sites), by using the app service or by corresponding with us by phone, e-mail or otherwise.

### **Information you give us on sign up**

This is information necessary to provide the basic RT app Service (to fulfil the contract between us) and to comply with regulatory obligations to 'Know Your Customer' (KYC):

- First and last name
- Email

### **Information you may provide us upon request**

This is information we require to unlock additional features upon your request and to fulfil the associated contract, or information we might request from you to perform our regulatory obligations:

- Address
- Date of birth
- Nationality

### **Information we automatically collect from your use of RT app**

When you use RT app, or visit our websites, we automatically collect information, including personal information, about the parts of the RT app Service you use, and how you use them. This information is necessary for the adequate performance of the contract between us, to enable us to fulfil our regulatory requirements, and given our legitimate interest in being able to provide the RT app Service:

**Information about your device** — your visits to and use of the site or the Service (including without limitation your IP address, geographical location, browser/platform type and version), internet service provider, operating system

**Information about your use of the product** — length of visit, page views, website navigation and search terms that you use, referral source/exit pages



### **Information we may receive from third parties**

We receive the following personal information about you from our third party service providers who assist us in providing some or all of the Service:

**Your bank** (through our Aggregation Partners) — bank account number, sort code, balances, and transaction data, in order to fulfil the contract with you

**Our KYC provider** — in order to perform money-laundering checks

**Public and Commercial Sources** — in order to perform our KYC obligations, we might collect information from public sources such as sanctions lists or credit reference agencies

### **How we use the information we collect from you**

To provide and improve the RT app product — we process the information we collect given our legitimate interest in improving the RT app Service, and in order to fulfil the contract we have with you:

- Provide you with access to RT app, and to enable your interaction with RT app
- Provide customer service
- Provide you with insights, and balance updates (if you've opted into this)
- Provide you with recommendations for products we feel may be of interest or benefit to you
- Send you support messages, updates, security alerts, and account notifications
- To administer our site and the Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

**To prevent fraud, and ensure compliance with regulatory obligations** — we process the information we collect given our legitimate interest to protect us from fraud, and to comply with our regulatory obligations:

- Detect fraud
- To verify your identity, and check it against sanction lists
- To keep our platform secure

### **Others we share your data with**

Service providers — In order to fulfil the contract we have with you, we use certain trusted service providers. These providers will each handle your personal data in accordance with their own Privacy Policy. The most important service providers are highlighted below:

- **Account Aggregation Providers** (Yolt Technology Services) — We use account aggregation providers to help us to provide the service by securely accessing your



bank account information (“Account Aggregators”). By using the Account Aggregator’s service, you agree and grant them permission to aggregate your personal data, which may then be stored outside of your own country subject to constraints provided by GDPR.

- **Government Entities** — In order to comply with our regulatory obligations to report activity suspected to be money laundering we might share your information with government entities responsible for this. We may be required to by the Financial Conduct Authority or the Financial Ombudsman to share personal data with them.

**Other RT app users** — in providing a referral programme there is a legitimate interest in sharing your RT app name with the person who invited you, to let them know the invite was successful and in order to fulfil the invite terms.

**Aggregated Data** — we may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and non-personally identifiable information for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes. This is not considered personal data under GDPR as it can’t be used to directly or indirectly identify you.

**Business Transfers** — in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If Real Technologies Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

### **Retention Periods**

We generally retain your information for as long as it is necessary for the performance of the contract we have with you, or to comply with our regulatory obligations. If you no longer want us to use your information you can send a request to [office@real-technologies.co.uk](mailto:office@real-technologies.co.uk). Please note that if you request erasure of your personal data, we will keep relevant personal information for at least 5 years to comply with our regulatory obligations.

### **Your Rights under GDPR**

A great thing about the GDPR is that consumers have much more control over how companies like RT app use your data. See below how you can assert those rights with RT app.



**Getting a copy of your data** — you have the right to get a copy of the data we hold about you. This is free of charge. To do this, please reach out to [office@real-technologies.co.uk](mailto:office@real-technologies.co.uk), or talk to our support team by clicking 'Support' icon in the RT app.

**Rectification of inaccurate or incomplete information** — you have the right to ask us to update any information we hold which may be inaccurate, and which you can't change yourself through the RT app.

**Erasure of data or the 'right to be forgotten'** — you have the right to ask us to erase personal information we hold on you, and close your RT app account. If you do this, we might maintain personal information we hold on you which is necessary to comply with our regulatory obligations, or to reduce fraud.

**Withdrawing consent, and restricting processing** — to withdraw consent or restrict processing you may contact customer support. If you withdraw consent to share your financial transaction data, we will be unable to provide the RT app service to you. Some information you have provided us will be retained after you withdraw consent to comply with regulatory obligations.

**Lodging complaints** — you have the right to lodge a complaint with the Information Commissioner's office for any processing carried out by RT app. You can contact the ICO [ico.org.uk](http://ico.org.uk) or telephone: 0303 123 1113.

### **Where we store your data**

All information you provide to us is stored on the secure servers of our business partners. Any transmission of information to our partners (including information to facilitate payments) are encrypted using TLS technology, the current standard in secure communications over the Internet. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. Information we deem sensitive (like your bank account number and sort code and your national insurance number if provided) are stored using state-of-the-art symmetric encryption (AES). We will only send your data outside of the European Economic Area ('EEA') to comply with a legal obligation, or when we work with third parties in providing you the RT app service. If we do transfer your personal information outside the EEA to our suppliers, we will make sure that it is protected to the same extent as in the EEA.



## Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or by any instant messaging service we use to provide the Service. Please check back frequently to see any updates or changes to our privacy policy.

## Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [office@real-technologies.co.uk](mailto:office@real-technologies.co.uk).



## YTS PRIVACY POLICY

**This YTS Privacy Policy is applicable to the processing of your personal data as part of the YTS Account Information Services and YTS Payment Initiation Services ("YTS Services") that are made available and distributed through 'RT APP' provided by Real Technologies you have just downloaded.**

**The YTS Services are made available to you by Yolt Technology Services Limited ("YTS") and YTS is the controller of the personal data it processes under the YTS Services**

**You have a separate relationship with the provider of the App and services for the personal data it collects, holds and processes about you. Please read their privacy policy too.**

**This Privacy Policy must be read in conjunction with the Terms and Conditions**

### 1. WHAT PERSONAL DATA DOES YTS USE?

#### What is personal data?

Personal data is any data relating to a person who is identified or who can be identified (such as a name, an identification number, or an online identifier).

**Personal data you give YTS:** You may give YTS personal data about you by interacting with the YTS Services, our website, or by corresponding with YTS by phone, email or otherwise. Examples of personal data include:

- name, address, email address and phone number
- information YTS need to initiate and process the transfer of money on your behalf and send an instruction to your connected bank(s) (payment initiation services)
- copies of personal identification documents (such as your Passport, ID, Driver License)
- personal information required to identify you and verify the information you give YTS
- biometric data (such as fingerprint or facial recognition data) to grant access to our app on your device.

**Personal data from connected banks:** If you connect one of your banks to the YTS Services or use our payment initiation services, YTS will collect data from your connected banks, such as:

- bank account details, account numbers, information about your transactions,
- information identifying the account you have with your connected bank;
- information to initiate and process the transfer of money on your behalf
- transactions made on those accounts



- your direct debits and standing orders as part of your account information, YTS may collect sensitive personal data: For example, if you have a payment for a membership to a particular political party, this could reveal your political beliefs. YTS will not profile you on the basis of this data and YTS will not use this data for any purposes other than providing our services as detailed hereunder.

#### **Personal data YTS collect from you:**

When you use the YTS Services or YTS website, YTS may – ourselves or through our partners - collect information such as:

- IP address
- device details
- your login information
- information about each visit you make to the YTS Services (such as page response times and length of visit)
- location data
- info about your use of the YTS Services or website through tracking tools
- information YTS requires to comply with our legal and regulatory obligations (such as “Know-Your-Customer” and “Customer Due Diligence”)
- information to verify the data you give YTS
- information from your phone (like contact details from your address book) if you give YTS consent to use that data

We use well-known advertising platforms such as Facebook and Google in promoting our YTS Services:

- If you click through such an advert and start using YTS Services, an automated process will confirm to the advertising platform that you have signed up to the YTS Services and how much you use the App
- If you don't use these platforms YTS will not collect or process this data

Any data you share on social media platforms will be accessible by them as described in their terms of service.

We use tools to improve the user experience of our website and to personalise your YTS Services experience. Therefore, YTS performs statistical analyses about the way you use the services of Yolt (such as information on how you navigate, how much time you spend, how long you visit, and from where you came to our service):

- For our website: Yolt uses Google Analytics on our website. We don't use Google Analytics on our app or on your transaction data.
- For our YTS Services: Yolt uses Webbtrek to personalise your App.

If you don't want this, you can always disable this through the Cookie Settings on the website or via the privacy settings in the App.

## **2. WHAT DO WE USE YOUR PERSONAL DATA FOR?**

**Contractual performance:** If you want YTS to deliver the YTS Services, YTS can only perform these services if YTS can process your personal data for this purpose.

**Your consent:** YTS relies on your consent to process and use your personal data for the following purposes:

- To provide information on your Accounts, such as an account overview or insights in your financial situation
- To initiate payments on your behalf
- To (re)use personal information YTS has collected to identify you and to verify your identity to validate the data YTS holds about you and enrich your data (this excludes ID copies)
- If you wish to share the copy of the ID document YTS holds for other purposes (e.g. because other providers or parties would need it to enrol you in their products or services) you choose to do so upon your further specific consent at that point in time, either directly towards us or via such other provider or party.

**Legitimate interest:** YTS uses your personal data on the basis of our legitimate interest so that YTS can:

- Create a persona about you, so:
  - YTS can give you relevant insights in your financial situation
  - YTS can deliver the benefit of the YTS Services
  - YTS can build better personas
- Provide you with updates about YTS and the YTS Services
- Improve your experience of our YTS Services:
  - Assess the use of the YTS Services
  - Help YTS identify people like you that might enjoy the App



- Enrich our database so we can build better YTS Services
- Service improvement and optimization of our YTS Services and other services of YTS
- Make a secure connection between your device and the YTS Services
- Take action if YTS needs to defend our rights under the YTS Terms if you misbehave or act in deviation of laws or regulations or the YTS Terms
- Track and examine the use of the YTS Services and the website to prepare reports on its activities, analyse that data and use it for YTS' business purposes
- Attract new YTS partners and clients
- Perform research and trend analysis

YTS could use your personal data in an anonymised and aggregated form:

- to enrich content in blog posts and infographics of other Yolt Group entities
- to develop and deliver additional or ancillary services (such as data insights or market analysis)
- for social media posts
- for campaigns
- for analytical research
- for other commercial or business purposes

This will never contain data or insights or information that can be tracked down to you personally.

YTS will always use the minimum data required and will process to the minimum extent required.

**Legal obligations:** YTS will also process your personal data where YTS is under a legal obligation to do so to:

- identify you and verify your identity to comply with our Customer Due Diligence and Know-Your-Customer obligations
- prevent and detect fraud, money laundering, other crime, and security issues, and to reduce YTS' risks;
- comply with laws and regulations, as well as any sector-specific guidelines and regulations.

**Please be aware that if you do not want YTS to process the data for the purposes set out above, that YTS cannot deliver you our services. The YTS Services are about being smart and getting smart with data. Without the use of your data there are no YTS Services.**

### 3. YOUR KEY RIGHTS

Your primary right is the **right to stop processing your data** (right to object):

- The YTS Services are designed to put you in control and enables you to withdraw your consent by deleting a connected bank
- Sending YTS an email with the request to be forgotten if the above does not work or if you cannot connect to the App.
- You have the right to ask YTS not to process your personal data for marketing purposes:
  - You can always unsubscribe to our emails and campaigns
- You have the right to object to YTS processing information about you where YTS does so on the basis of a legitimate interest. If YTS cannot make that work, it could mean that YTS may not be able to provide you with the YTS Services at all and will stop your access to the YTS Services.

This would not invalidate any processing of the personal data prior to your withdrawal of consent.

Your **other rights** are:

**Right of access and data portability:** All data that you have provided YTS with is accessible in the YTS Services and the App that the YTS Services are made available in.

You can request a copy of all personal data you have provided YTS through that App or via the email-address you have provided at registration.

If technically possible, YTS will help you to automatically export this data to other platforms or users.

YTS can only give you the data YTS hold ourselves. Any data that the App provider, a YTS Client or other parties hold about you is with them. You should request deletion of that data and your right to be forgotten directly with them.

**Right to rectification:** You can control your data through the App. Where you cannot change this data through the App, you have the right to ask YTS to rectify inaccurate or incomplete personal data which YTS have about you.



**Right to erasure:** You have the right to ask YTS to erase your personal data:

- You can delete your YTS account through the app. This will automatically delete all information YTS have about you.
- Be aware that the partners you have activated may still have data about you. You will need to contact them directly in order for them to delete this data.

**Right to restrict:** YTS has the right to restrict the processing of your personal data where:

- you contest the accuracy of the personal data we hold about you, for a period enabling YTS to verify the accuracy of the personal data;
- the processing of your personal data is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- you have objected to processing of your personal data pending the verification whether the legitimate grounds of the YTS override yours.

Where YTS does no longer need your personal data for the purposes of the processing, but we are required to keep it for the establishment, exercise or defence of legal claims we automatically restrict the processing of your personal data to this purpose.

**Right to object to automatic processing:** You don't need to object because YTS don't subject you to decisions based solely on automated processing which significantly affect you.

#### **4. WHERE DOES YTS STORE YOUR PERSONAL DATA?**

**Your data is stored in Europe:** The personal data YTS collect from you is stored on secure information technology systems located in the European Economic Area ("EEA") (for example: The Netherlands, Germany and Ireland) and the United Kingdom, but it may be processed or viewed by staff or companies outside the EEA or the UK who work for YTS or one of our partners.

Regardless of location, YTS will always impose on our employees or contractors the same data protection safeguards that we use inside the EEA and the UK. Where we are transferring your data to countries which are outside the EEA or UK and that have not been approved by the European Commission or other relevant authorities as providing essentially equivalent protections to within the EEA, we will transfer it to European Commission and UK authorities approved contractual terms.

We do not control where your App provider stores or processes your data and they can **decide to store your data in other countries or parts of the world than YTS does.**

YTS recommends you to carefully read their privacy policies.

#### **5. PROTECTING YOUR PERSONAL DATA**

**Security is in our DNA:**

- YTS is committed to ensuring that your personal data (including your Account Information and financial details) are secure.
- In order to prevent unauthorised access to or disclosure of it, YTS has put in place suitable physical, electronic and operational procedures to safeguard and secure the personal data YTS collects about you.
- In particular, YTS protects your personal data by deploying high standard encryption algorithms.
- YTS meet security standards imposed by law that are applicable to the operation of YTS.
- YTS will never ask your PIN or other security credentials.

**Help YTS protect you:**

- To help YTS protect your personal data, you agree to comply with our security policies and procedures that YTS may notify to you from time to time.
- You also agree to take all reasonable steps to prevent the unauthorised or fraudulent use of the YTS Services of the App that the YTS Services are part of (e.g. your User Login or PIN code, or other security credentials).
- If you find out or suspect that your credentials have been lost, stolen, or someone has used it without your permission, you must tell YTS and the App provider as soon as possible.

#### **6. PROVIDERS, YOLT GROUP, REGULATORS AND LAW ENFORCEMENT**

Other than what is described above, YTS will only share your personal data in a very limited way.

This will happen:

- where YTS need to use services YTS cannot build ourselves or have a duty or legal obligations to disclose it;



- within the group of entities organized under Yolt Group BV ("Yolt Group") of which YTS is part of, e.g. because parts of the YTS Services may be delivered by other entities in the Yolt Group.
- **Our service providers** (including their sub-contractors). This may happen where they help YTS to run our service or the technology systems that are needed to operate our App and services. This includes:
  1. Providers of data storage, data management and platform providers to safely and securely store and process your data. This includes Amazon Web Services (AWS). YTS will only deploy your data on AWS installations in Europe.
  2. Aggregation service providers, where necessary in order to retrieve Account Information for use in the YTS Services on your behalf.
  3. Identification and verification service providers, to help YTS adhere to our legal obligations to verify your identity and the information you give YTS. These may include:
    - a. SafeNed Limited (United Kingdom)
    - b. SafeNed B.V. (the Netherlands)
  4. Social Media Platforms via campaign-IDs so that YTS can build relevant content on Social Media. Any data you share on Social Media Platforms will be accessible by them as described in their terms of service
  5. Email services e.g. to send you regular updates or communication.
  6. Customer relation management to provide you with customer care services.
  7. Website and app analytics to provide you with the best experience.
- **Yolt Group:** YTS may transfer your personal data within the Yolt Group and have the entities within the Yolt Group process your personal data. Use of your personal data within the Yolt Group:
  - Will always be bound by and limited by the provisions of this Privacy Policy;
  - Does not limit or take away the liability and accountability of YTS towards you for the processing of this data within the Yolt Group
- **Regulators** in connection with their duties, such as crime prevention or carrying out regulatory oversight of what YTS does.
- **Fraud prevention agencies and law enforcement agencies**, to prevent and detect fraud, money laundering or other crimes.

## 7. HOW LONG DO WE KEEP YOUR DATA

YTS is allowed to keep your personal data only for as long as it's still necessary for the purpose YTS initially required it.

But as YTS is in financial services and bound by strict regulations, this means that YTS needs to retain the data YTS holds about you for a minimum of **7 years after you have stopped using the YTS Services**. If (local) regulations require YTS to retain it longer or delete it sooner, YTS will follow these retention periods.

If you delete your YTS Services data or invoke your right to be forgotten, YTS will use feasible solutions to make it no longer directly available in our systems, like archiving it. This means that in such case:

- YTS will no longer actively process your data as part of the YTS Services;
- It will continue to be available for processing under a legal or regulatory obligation;
- an

## 8. USING COMPUTERS TO MAKE DECISIONS ABOUT YOU

We do not use automatic processing or profiling to make automated decisions about you that could significantly impact you (like refusing you financial products or credit profiling).

## 9. OUR CONTACT DETAILS

- YTS is authorised by the Financial Conduct Authority under the Payment Service Regulations 2017 for the TPP Functions. You can find details on YTS at register.fca.org.uk (reference number: 921127 or (searching for "Yolt Technology Services")
- YTS is located at 8-10 Moorgate, London EC2R 6DA, United Kingdom.
- YTS is a trade mark of Yolt Group BV.
- You can exercise any of the rights under this privacy policy or contact YTS at:

[yrt@yolt.com](mailto:yrt@yolt.com)

- You can contact our Data Protection Officer through:



[DPO@yolt.com](mailto:DPO@yolt.com)

**COMPLAINTS TO THE PRIVACY REGULATOR**

You have the right to complain to the privacy regulator in the country in which you reside, where you work, or anywhere where you believe YTS might have broken data protection rules.

In the UK, the privacy regulator is the Information Commissioner's Office (the "ICO"). The ICO can be contacted at:

- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Telephone: 0303 123 1113 (local rate) or 01625 545 745
- Email: <https://ico.org.uk/global/contact-YTS/email/>