

Outmin

Privacy Notice

Commitment to Privacy

Outmin Ltd ("**Outmin**") respects your privacy and is committed to protecting your personal data. This privacy notice (the "Notice") will inform you as to how we look after your personal data when you access or use any of our website, mobile applications and products, when you consent to cookies, when you speak to our staff, or when you otherwise interact with us or provide us with personal information on you or individuals connected with you (collectively, the "**Services**").

In this Notice, "we", "us" and "our" refers to Outmin

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Notice.

This policy was last updated on 30 April 2021.

1 IMPORTANT INFORMATION AND WHO WE ARE

2 THE DATA WE COLLECT ABOUT YOU

3 HOW IS YOUR PERSONAL DATA COLLECTED

4 HOW WE USE YOUR PERSONAL DATA

5 DISCLOSURES OF YOUR PERSONAL DATA

6 INTERNATIONAL TRANSFERS

7 DATA SECURITY

8 DATA RETENTION

9 YOUR LEGAL RIGHTS

10 GLOSSARY

1 Important information and who we are

1.1 Purpose of this Privacy Notice

- (a) This Privacy Notice aims to give you information on how we collect and process your personal data through your use of our Services including when you sign up to our newsletter and/or submit a query.
- (b) We are committed to protecting the privacy of children. Our Services are intended for use by adults, and are not intended for, nor designed to be used by children under the age of 18. We do not collect personally identifiable information from any person we know is under the age of 18.

- (c) It is important that you read this Privacy Notice together with any other Privacy Notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them.

1.2 Controller

- (a) If you have any questions about this Privacy Notice or information we hold about you, including any requests to exercise your legal rights, please contact support@outmin.com or write to us at Privacy Officer, Outmin 11a Baggot Lane, Ballsbridge, D04E5R9, Ireland
- (b) You have the right to make a complaint to a data protection supervisory authority at any time. The Data Protection Commission ("**DPC**") is the Irish supervisory authority and can be contacted at info@dataprotection.ie. We would, however, appreciate the chance to deal with your concerns before you approach the DPC or another data protection supervisory authority so please contact us in the first instance.

1.3 Changes to this Privacy Notice

We keep our Privacy Notice under regular review and we will place any updates on this web page. We advise you to review this page regularly to stay informed and to make sure that you are happy with any changes. If we make material changes to this Notice we will notify you by email or through posting a notification when you log into our Services or when you open our mobile application. This Privacy Notice was last updated on 30 April 2021 and is published in accordance with the requirements of the General Data Protection Regulation (EU) 2016/679.

1.4 Changes to your personal data

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 your relationship with us.

1.5 Third-party links

Our Services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Services, we encourage you to read the Privacy Notice of every website you visit.

2 The data we collect about you

2.1 Types of Users

We collect information about and from unregistered users and registered users.

- (a) Unregistered Users: You must register to use our Services. However, you may access certain areas of our Services without registering. In these circumstances, we passively collect non-personally identifiable information using cookies such as your IP address, referring website, the type of browser or operating system you have, the type of hardware you have, what pages on the site you have viewed, as well as access dates and times. This is not traced back to any individual and we cannot identify you from this information. When you first visit our website and mobile applications, you will see a message informing you about cookies and an option to accept or manage

cookies. For information about the cookies we use and how to accept or decline cookies, please see <https://outmin.io/cookie-policy/>

- (b) Customers and Service Users: When you register to use our Services you are asked to provide identifying information such as your name, nationality, username, password, e-mail address, mobile telephone number and demographic information and other information required in order to verify your identity as required by applicable anti-money laundering laws and in order to prevent fraud.

2.2 Types of Data

- (a) Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- (b) We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - (i) **Identity Data** includes first name, maiden name, last name, username or similar identifier, title/position, date of birth and gender, company name, legal form, VAT number, company registration number, date of registration business type, nature and purpose of your business and directors and ultimate beneficial owners' details.
 - (ii) **Contact Data** includes billing address, business address, business name, email address and telephone numbers.
 - (iii) **Financial Data** includes credit rating, financial history, bank account details, time, location, transaction amount, refunds, payment method and cardholder details.
 - (iv) **Technical Data** includes internet protocol (IP) address, device identifier, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Services.
 - (v) **Profile Data** includes your LinkedIn profile username, your interests, preferences, feedback and survey responses.
 - (vi) **Usage Data** includes information about how you use our Services.
 - (vii) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (c) We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Service 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 Notice.
- (d) Unless required by law, we will not, without your explicit consent, collect **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) or information about criminal convictions and offences.

2.3 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

3 How is your personal data collected?

We use different methods to collect data from and about you including through:

3.1 Direct interactions. You may give us your Identity and Contact Data filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:

- (a) subscribe to our Services;
- (b) request marketing to be sent to you;
- (c) enter a survey;
- (d) apply for a job in our "Careers" section;
- (e) give us some feedback; or
- (f) submit a query.

3.2 Third parties or publicly available sources.

We may receive personal data about you from various third parties, including Technical Data from analytics providers/advertising networks and search information providers such as Google.

4 How we use your personal data

4.1 Lawful basis

- (a) We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances where:
 - (i) we need to perform the contract we are about to enter into or have entered into with you;
 - (ii) it is necessary for our legitimate interests (or those of a third party such as your employer who has enter into a contract with us for the provision of services) and your interests and fundamental rights do not override those interests; or
 - (iii) where we need to comply with a legal or regulatory obligation.
- (b) Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to

you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at support@outmin.com.

4.2 Purposes for which we will use your personal data

- (a) We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- (b) Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at support@outmin.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) providing Services you (or a third party) have requested, administering subscriptions and relevant information to you in connection with the Services including transaction receipts, payout reports, security alerts and support messages; (b) registering you as a customer/Service user (c) complying with our anti-money laundering obligations with respect to customers; (d) notifying you about changes to our terms or Privacy Notice (e) asking you to complete a market research survey (f) other activities necessary for the maintenance of our relationship with you. 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Financial (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) performance of a contract with you (b) necessary to comply with a legal obligation (c) necessary for our legitimate interests (to provide services to our customers, to keep our records up-to-date).
<p>To administer and protect the rights, property, business, safety of Outmin, our Services, our customers and others (including the provision and maintenance of our Services such as troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Technical 	<ul style="list-style-type: none"> (a) necessary for our legitimate interests (for the provision of administration and IT services, network security, to investigate and prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) necessary to comply with a legal obligation.
<p>To deliver relevant content and advertisements to you on our</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact 	<p>necessary for our legitimate interests (to improve our Services, study how</p>

Services, third party websites and social media channels, and measure or understand the effectiveness of the advertising we serve to you.	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	users use our Services, to develop them, grow our business and to inform our marketing strategy).
To use data analytics to improve our Services, for promotions, incentives and rewards provided in connection with our Services, for marketing and improving customer relationships and experiences.	(a) Technical (b) Usage	necessary for our legitimate interests (to define types of customers for our service offerings, to keep our Services up-to-date and relevant, to develop our business and to inform our marketing strategy).
To communicate with you about news and updates to our Services and to inform you about any promotions, incentives and rewards offered by us and/or our partners.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) necessary for our legitimate interests (in promoting our activities, supporting our marketing strategy and sending you marketing materials, noting that you have the right to object to such marketing communications at any time) (b) you have provided consent (which may be withdrawn at any time).
To comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order; or in response to a physical threat to you or others, to protect property or defend or assert legal rights.	(a) Identity (b) Contact (c) Profile (d) Financial (e) Usage (f) Marketing and Communications (g) Technical	(a) necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) necessary to comply with a legal obligation.

4.3 Legal Compulsion

In the event that we are legally compelled to disclose your personally identifiable information to a third party, we will attempt to notify you unless doing so would violate the law, court order or government instruction.

4.4 General marketing

Outmin does not sell, rent or lease its customer lists to third parties. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms set out in paragraphs 4.5 – 4.10

4.5 Promotional offers from us

- (a) We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

- (b) You will receive marketing communications from us if you have requested information from us, received a service from us, or if you provided us with your details have not opted out of receiving that marketing.

4.6 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Outmin for marketing purposes.

4.7 Internet based advertising

We use LinkedIn, Google Search & Display, Facebook and Twitter advertising services and as such there are tracking codes installed on our website and mobile applications so that we can manage the effectiveness of these campaigns. We do not store any personal data within this type of tracking.

4.8 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at support@outmin.com at any time.

4.9 Cookies

The Outmin website and mobile applications uses “cookies” and third party services (including Google Analytics) to collect standard internet log information and details of visitor behaviour patterns. A cookie is a small text file that is placed on your device when you visit our website. You have the ability to accept or decline cookies except for strictly necessary cookies. For information about the cookies we use and how to accept or decline cookies, please see <https://outmin.io/cookie-policy/>

4.10 Mailing lists

We may use third party providers, such as Hubspot, to deliver promotional updates and gather statistics around email opening.

4.11 Change of purpose

- (a) We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at support@outmin.com.
- (b) If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- (c) Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 Disclosures of your personal data

5.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- (a) Internal Third Parties as set out in the Glossary; and

(b) External Third Parties as set out in the Glossary.

5.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5.3 Please contact us if you wish to obtain more information on the appropriate safeguards.

6 International transfers

6.1 Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

6.2 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

(a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.

(b) 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. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.

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

7 Data security

7.1 We are committed to ensuring that the information collected about you is secure. We take reasonable measures including administrative, technical and physical procedures to protect your information from loss, theft, misuse, unauthorised access, disclosure, alteration, and destruction.

7.2 When you are logged into your account, all Internet communication is secured using Secure Socket Layer (“**SSL**”) technology with high security 128 bit encryption. In respect of cardholder data which is processed, transmitted and stored within our systems, Outmin is certified as compliant under the Payment Card Industry Data Security Standard (PCI-DSS). We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7.3 We use security methods to determine the identity of registered users, so that appropriate rights and restrictions can be enforced for that user. Reliable verification of user identity is called authentication. We use both passwords and usernames to authenticate users. Users are responsible for maintaining their own passwords.

7.4 This high level of security can only be effective if you follow certain security practices yourself including never sharing your Account or login details with anyone. If you believe that any of your Account login details have been exposed, you can change your password at any time through our website or mobile application, but you should always also immediately contact customer service.

- 7.5 Transmission of information via the Internet is not completely secure. We do not warrant the security of our servers, nor do we warrant that your information, including Personal Information, will be completely secure or not be intercepted while being transmitted over the Internet. Any transmission of data by you is at your own risk. Once we have received your information, we will use strict procedures and security structures to prevent unauthorised access.
- 7.6 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority or other regulator of a breach where we are legally required to do so.

8 Data retention

- 8.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 8.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 8.3 We keep basic information about our customers (including Contact and Identity Data) for six years after our relationship with them ceases for tax and other legal purposes. Thereafter, we and our duly authorised delegates will refrain from collecting any further personal data on you and shall take appropriate steps to dispose of any records containing your personal data, to the extent this is operationally feasible and proportionate. Otherwise, we reserve the right to delete and destroy all of the information collected about you upon termination of your Account unless you request otherwise. If agreed we shall continue to store your information, for example your transaction history, which you may require for accounting purposes.
- 8.4 In some circumstances you can ask us to delete your data: see below for further information.
- 8.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9 Your legal rights

- 9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:
- (a) [\[Request access to your personal data\]](#).
 - (b) [\[Request correction of your personal data\]](#).
 - (c) [\[Request erasure of your personal data\]](#).
 - (d) [\[Object to processing of your personal data\]](#).
 - (e) [\[Request restriction of processing your personal data\]](#).
 - (f) [\[Request transfer of your personal data\]](#).

(g) [\[Right to withdraw consent\]](#).

- 9.2 If you would like to exercise any of the above rights, please use our dashboard or contact us at support@Outmin.com with your request.
- 9.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). 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.
- 9.4 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.
- 9.5 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.

10 Glossary

10.1 Lawful Basis

- (a) **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best offering and the best and most secure experience; we make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests; we do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law); you can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at support@outmin.com.
- (b) **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- (c) **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

10.2 Internal Third Parties

Means:

- (a) any member of our group of companies, including subsidiaries, our ultimate holding company and its subsidiaries where it is necessary to allow us to provide a full service to you where other companies within our group perform components of the full service offering. These other services include customer support, anti-money laundering, settlements and internal audit.
- (b) Service Providers: We may disclose information to the extent necessary with contractors, service providers and third parties who perform functions on our behalf in order to support our Services. This may include fraud prevention and verification

service providers, financial institutions, processors, payment card associations and other entities that are part of the payment and collections process.

10.3 External Third Parties

Means:

- (a) service providers based in who provide IT, system administration services, fraud prevention and verification service providers, financial institutions, processors, payment card associations and other entities that are part of the payment and collections process, cloud storage services, including Sendgrid, AWS, Heroku, Github, Stripe, GoCardless, Exchangerates.host;
- (b) professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services;
- (c) the Revenue Commissioners, regulators and other authorities which require reporting of processing activities in certain circumstances;
- (d) 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 or newly acquired businesses may use your personal data in the same way as set out in this Privacy Notice; and
- (e) third parties who we partner with for advertising campaigns, contests, special offers or other events or activities in connection with our Services, unless you choose to opt out of such communications.

11 Your Legal Rights

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 and to check that we are lawfully processing it.

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, 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 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 a

compelling legitimate ground to process your information which overrides your rights and freedoms.

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.

Request the transfer: of your personal data to you or to a third party. 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.

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. If you withdraw your consent, we may not be able to provide certain offerings to you. In addition, we may be required to continue to hold your personal data to fulfil legal and regulatory obligations. We will advise you if this is the case at the time you withdraw your consent.