



PRIVACY NOTICE

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WHO ARE WE?

Pledjar: The all in one charity app that brings the third sector into the digital age using open banking technology together with intricate Fintech security software. We aim to make donating easier for you whilst ensuring compliance to a high standard for charities and so with Pledjar, donors can select charities they wish to pledge their 'Spare Change'

You can contact **Pledjar** by email or by post as described in the **Get in Touch** section.

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 and mobile App.

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.

This page was last updated on **26TH NOVEMBER 2019**.

1. The information we collect about you

When you enrol as a donator on our site or mobile App, we collect the personal information you give us and we will hold the following data about you:





- We collect your full name, postal address, email address and date of birth;
- As a donator sets up more options for donations and other features through our website and mobile App, we collect information about how they interact with our system, including but not limited to, thresholds, alerts, the ways you donate, your chosen charities, and other donator activities.
- Information about your business activities
- Information and documents about your matters or enquiries, including communications with you
- Billing and payment information
- We also generate log files from various servers: this will include an IP address assigned to you or, more likely, to someone who provides you with Internet access.

Cookies

We collect cookies or similar tracking technologies. This means information that our website's server transfers to your computer. This information can be used to track your session on our website. Cookies may also be used to customize our website content for you as an individual. If you are using one of the common Internet web browsers, you can set up your browser to either let you know when you receive a cookie or to deny cookie access to your computer.

Children

We do not knowingly provide services to children. If you are below the age of 16, you may use our website or mobile App only with the permission and active involvement of a parent or legal guardian. If you are under the age of 16, please do not provide us or other website or mobile App visitors with any personal information and do not use this website or mobile App. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us (please see **Get in touch** section).

2. How we use your information (processing)

References to the [basis of processing](#) (e.g. "(Basis: Art. 6(f).)") show the article of the General Data Protection Regulation (GDPR) under which we undertake the processing in question.)

Providing you with a service to donate to your favourite charities

Information such as your full name, email and postal address are needed to allow you to access our services for processes such as processing enrolments, authentication. Other information is used for donations tracking or otherwise administering your account. We may send you emails in relation to donations you have made and other features you have used. We may also use your email to inform you about changes to the services we provide.

We use the information we hold about you and your business — both personal and otherwise — to give you the best charity donation service we can.

We use cookies to recognize your device and provide you with a personalized experience.





We also use your information to bill you, and keep track of payments that you make.

(Basis: GDPR Article 6(b): this is necessary to deliver the service to you.)

The table below specifies the data we collect about you on this basis and what we do to protect it:

Your information	Why we collect it	Do we stored it?	How we protect it
email	To set up your account and communicate with you in relation to managing your account with us	Yes	Encryption
Direct Debit Details	To process your payments. We only retain your account name, the last 4 digits of your sort code, the last 4 digits of your account number, and your authorization. This is to enable you to change, update, pause or cancel your direct debit instructions at any time.	Yes	Truncation
Debit card number	To process your payments. We only retain your account name, the last 4 digits of your card number.	Yes	Truncation when stored and tokenisation when processing payment
Card Expiry Date	To process your payments.	No	N/A
Card Verification Value	To process your payments.	No	N/A
Bank Name (for card account)	To process your payments.	No	N/A
Card Type	To process your payments. This is to allow us to set pricing levels.	Yes	Encryption
Roundup, one-off and fixed monthly	To process your payments. This can be changed any time in your App settings.	Yes	Encryption
Gift Aid declaration	To allow your selected charity to claim a rebate from the government. This can be changed at any time.	Yes	Encryption
Charity Code	The charities you have a relationship with or an interest in. You can change your preferences at any time through the settings on the App.	Yes	Encryption

Security & operations

We may use the logs from our servers as well as web analysis tools that are built into the PLEDJAR.COM website or on the mobile APP to measure and collect anonymous session information and to assist in our firm's security, as well as to determine visitor behaviour and help us plan our strategy (e.g. such as working out which pages on the site are most popular, or whether particular events have caused an increase in traffic).

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not unlawfully collected, inappropriately lost, misused, accessed, disclosed, altered or destroyed.





(Basis: GDPR Art. 6(c): we have legal and regulatory obligations to protect our clients and their information. GDPR Article 6(f): strategy planning is a legitimate, indeed sensible, thing for a business to do.)

The table below specifies the data we collect about you on these bases and what we do to protect it:

Your information	Why we collect it	Do we stored it?	How we protect it
Full Name	To comply with our obligations in relation to the Anti-Money Laundering regulations.	Yes	Encryption
Postal Address	To comply with our obligations in relation to the Anti-Money Laundering regulations. This is also used as your billing address, should you choose to pay by card.	Yes	Encryption
Date of Birth	To comply with our obligations in relation to the Anti-Money Laundering and Data Protection regulations.	Yes	Encryption
Occupation	To comply with our obligations in relation to the Anti-Money Laundering regulations. [NOT SURE ABOUT THIS]	Yes	Encryption
Mobile Phone Nbr	To protect your account by providing you multi-step authentication	Yes	Encryption
Biometric Fingerprint	To protect your account by providing you multi-step authentication and secure access to our App.	No	N/A
Password	To protect your account by providing you multi-step authentication and secure access to our App.	Yes	Encryption

Email Marketing Communications

We may also send you emails about our website and mobile app, survey you about your usage, present you with a list of charities you may be interested in, or collect your opinion. As this is a secondary purpose for using your information we will either ask you directly for your explicit consent, or provide you with an opportunity to say no.

If after you opt-in, you change your mind, you may withdraw your consent for us to contact you for purposes other than account administration, at any time, by changing the settings on your account or by contacting us (please see **Get in touch** section).

(Basis: GDPR Art. 6(a): you have given us consent to the processing of your personal data for one or more specific purposes.)

The table below specifies the data we collect about you on this basis and what we do to protect it:

Your information	Why we collect it	Do we stored it?	How we protect it
email	To communicate with you in relation with other charities you may be interested in, and other marketing activities	Yes	Encryption
gender	To tailor your charity selections and offer you a customized service.	Yes	Encryption





geolocation	We only use this whilst you are using the App to give you a list of charities near you.	No	N/A
Facebook Handle	We use this to share the love and demonstrate the good you are doing.	Yes	Encryption
Instagram	We use this to share the love and demonstrate the good you are doing	Yes	Encryption

3. How we share your data with third parties

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

Certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

Amazon

Our services are hosted by amazon, a **UK** company. They provide us with the online hosting platform that allows us to provide our services to you.

Your data is stored through amazon's data storage and databases. They store your data on a secure server behind a firewall.

For more insight, you may also want to read amazon servers's Privacy Statement here

Bottomline Technologies

If you make a purchase on our site, we use third party payment processor Bottomline Technologies. Card Payment processing is compliant with the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction card data is stored only as long as is necessary to complete your purchase transaction. PCI-DSS requirements help ensure the secure handling of payment card information by our website and web App and related services and its service providers. Bottomline Technologies also provide us with Direct Debit processing.

For more insight, you may also want to read Bottomline Technologies' Privacy Statement here <https://www.bottomline.com/uk/privacy>

Truelayer

If you wish to make a purchase on our site through Open Banking, we use third party gateway operator TrueLayer. We do not see or store any of your banking details. When using Open Banking, this interface will allow you to be redirected to your own bank, where you can login





and authorise the App. You are at all time in full control of which banks you want to add or remove and of the authorisation(s) you give.

For more insight, you may also want to read TrueLayer's Privacy Statement here <https://truelayer.com/privacy/>

Charities

The list of charities we partner with can be found on our website or via the search icon on the app

We will share the following information with your selected charities for the purpose of making donations:

Your information	Why we share it
Name, address, amount of donation, gift aid declaration	So that they can claim gift aid from the government

(Basis: GDPR Article 6(b): this is necessary to deliver the service to you.)

If you have given us your consent to share your data with charity partners for marketing purposes, the following will be shared:

Your information	Why we share it
Causes, age, gender, address	To ensure you get the best selection of charities that meet your preferences also based on your location.

(Basis: GDPR Art. 6(a): you have given us consent to the processing of your personal data for one or more specific purposes.)

External Links

When you click on external links on our website or mobile App, they may direct you away from our site or mobile App. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

4. Disclosure

We do not trade personal data for commercial purposes and will only disclose it if required by law or for the defense of a legal claim, if necessary to administer your account on our site, or with your consent.





5. Your rights

You have lots of rights in respect of our processing of your personal data. The relevant rights are:

- get access to your personal data and information about our processing of it
- in some circumstances, restrict our processing of your data for strategy planning purposes, and compel us to erase the bits we do not use for security purposes
- object to our processing for strategy planning purposes
- have your data corrected or entirely deleted

If you want to exercise any of these rights, please just contact us (See **Get in touch** section)

You also have the right to lodge a complaint about our processing with a supervisory authority — if you are in the UK, you probably want the **UK's Information Commissioner's Office**.

6. Changes to this Privacy Policy

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website and mobile App. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

If our website or mobile App is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to offer services to you.

7. ICO REGISTRATION

Pledjar is registered with the Information Commissioner's Office (registration number ZA566589).

8. GET IN TOUCH

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information, you can either

do this through the App,

or email to hello@pledjar.com,

or by mail at

29a Stratford Office Village
Walker Avenue
Milton Keynes
MK12 5TW
United Kingdom

