



Twig Privacy Policy

Effective Date: 28th June 2021

1. About Twig

- 1.1. At Twig, we care about your personal data and we are committed to protecting and respecting your privacy. When we say “**personal data**”, we mean information which can be used to personally identify you (for example, a combination of your name and postal address).
- 1.2. At Twig we will:
 - (a) always keep your personal data safe and private; and
 - (b) allow you to manage and review the use of your data and your marketing choices at any time.

2. Why do I need to read this Privacy Policy?

- 2.1. This Privacy Policy should be read alongside, and in addition to our [Twig Seller Terms](#).
- 2.2. Collectively* these terms shall apply whenever you use our:
 - (a) website;
 - (b) the Twig app; or
 - (c) any of the services you can get access to through the Twig app or website.

*collectively referred to herein as the “**Services**”

- 2.3. For the purposes of the Data Protection Act 1998, **Diem Group Limited** (trading as Twig) is the Data Controller for your Data (other than retailer-provided information), whose registered address is at 69 Wilson Street, London EC2A 2BB, United Kingdom.
- 2.4. In the event you have any questions or concerns regarding the use of your data, you can always contact us at support@twigcard.com.

3. Age Restrictions and Use of Twig Services

We do not knowingly collect or solicit personal data from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any personal data about yourself to us. If we learn that we have collected personal data from a child under the age of 18, we will delete that information as quickly as possible. If you believe that a child under 18 may have provided us personal data, please contact us at support@twigcard.com.

4. Changes to this Privacy Policy

We're constantly striving to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to changes by placing a notice on the Twigcard.com website at www.twigcard.com/privacy and Twig app, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you are deemed to agree to all of the changes.

5. What personal data will Twig collect about me?

We will collect different types of personal data from you and others. The table below explains what personal data we will collect and how we will use it:

Type of Personal Data	Details
Information you provide to us	We may collect, process and store information you provide to us when you:
	● Fill in any forms;
	● Correspond with us;
	● Open an account or use any of our services;
	● Take part in any online discussions;
	● Speak with a member of our staff or support teams;
	● Enter a competition; and
	● Contact us for any other reason.

	We may collect the following information:
	<ul style="list-style-type: none"> Your name, address, and date of birth;
	<ul style="list-style-type: none"> Your email address, phone number and details of the device you use (for example, your phone, computer or tablet);
	<ul style="list-style-type: none"> Your Twig username, password and other registration information;
	<ul style="list-style-type: none"> Details of your bank account, including the account number, sort code and IBAN;
	<ul style="list-style-type: none"> Details of your Twig debit cards and credit cards (or other debit or credit cards you have registered with us), including the card number, expiry date and CVC (the last three digits of the number on the back of the card);
	<ul style="list-style-type: none"> Identification documents (for example, your passport or driving licence), copies of any documents you have provided for identification purposes, and any other information you provide to prove you are eligible to use our services;
	<ul style="list-style-type: none"> Information you provide when you apply for Twig Debit Card, including details about your income and financial obligations;
	<ul style="list-style-type: none"> Records of our discussions, if you contact us or we contact you (including records of phone calls);
	<ul style="list-style-type: none"> Your image in photo or video form (where required as part of our Know-Your-Client (KYC) checks or where you upload a photo to your Twig account).
<p>Please note: If you give us personal data about other people (such as your spouse or family), or you ask us to share their personal data with third parties, you confirm that you have brought this policy to their attention beforehand.</p>	
<p>Information from your device</p>	<p>Whenever you use our website or the Twig app, we may collect the following information:</p>

	<ul style="list-style-type: none"> • Technical information, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, the browser type and version, the time-zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use. • Information about your visit, including the links you have clicked on, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page. • Information on transactions (for example, payments into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction (including merchants' and ATMs' locations), IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, details of device used to arrange the payment and the payment method used. • Information stored on your device, including if you give us access to contact information from your contacts list. The Twig app will regularly collect this information in order to stay up to date (but only if you have given us permission).
<p>Information about your location</p>	<ul style="list-style-type: none"> • If you have location services in the Twig app switched on, we track your location using GPS technology.
<p>Information from others</p>	<ul style="list-style-type: none"> • We collect personal data from third parties, such as credit-reference agencies, financial or credit institutions, official registers and databases, as well as fraud-prevention agencies and partners who help

	<p>us to provide our Services.</p>
	<ul style="list-style-type: none"> • This includes your credit record, information about late payments, information to help us check your identity, information about your spouse and family (if applicable in the context of an application for credit that you make) and information relating to your transactions.
	<ul style="list-style-type: none"> • When you ask us to, we will also collect personal data from accounts you hold with third party banks (and some accounts with third party providers that are not banks) so that you can see everything in one place in your Twig app. You can create a linked account by activating Open Banking in the app.
	<ul style="list-style-type: none"> • Information about your visit, including the links you have clicked on, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page.
	<ul style="list-style-type: none"> • Information on transactions (for example, payments into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction (including merchants' and ATMs' locations), IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, details of device used to arrange the payment and the payment method used.
	<ul style="list-style-type: none"> • Information stored on your device, including if you give us access to contact information from your contacts list. The Twig app will regularly collect this information in order to stay up to date (but only if you have given us permission).
<p>Information from social media</p>	<ul style="list-style-type: none"> • Occasionally, we will use publicly available information about you from selected social media websites or apps to carry out enhanced due diligence checks. Publicly available information from social media websites or apps may also be provided to us when we conduct general searches on you (for

	example, to comply with our anti-money laundering or sanctions screening obligations).
Information collected automatically	<ul style="list-style-type: none"> • Whenever you interact with our website or the Twig app, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, device identification, “cookie” information, the type of browser and/or device you are using to access our Services, and the page or feature you requested. “Cookies” are identifiers we may transfer to your browser or device that allow us to recognise your browser or device and tell us how and when pages and features in our Services are visited and by how many people – see our Cookies Policy for more information on how we use cookies technology in our Services. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features. • If you click on a link to a third party website or service, a third party may also transmit cookies to you. Please note this Privacy Policy does not cover the use of cookies by any third parties, and we are not responsible for their Privacy Policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honour “Do Not Track” requests you have set using your browser or device.

6. How does Twig use my data collected about me?

We must have a valid legal reason for using, storing and processing your personal data we collect about you. At Twig our legal basis will be one of the following:

(a) Information you give to us

We will use this information:

- i. carrying out our contractual obligations arising from any contracts entered into between you and us, and to provide you with the information and Services you request from us;
- ii. subject to your consent on the relevant subscription form, to provide you with information about other services we offer that are similar to those you have already purchased or enquired about;

- iii. subject to your consent on the relevant subscription form, to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and Services similar to those which were the subject of a previous contract or negotiation with you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this;
- iv. to notify you about changes to the services we provide to you under your contract with us;
- v. to ensure that content from our website is presented in the most effective manner for you and the device you are using to access the website.

(b) Information we collect about you

We will use this information:

- i. to administer our website and apps, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- ii. to improve our website and apps to ensure that content is presented in the most effective manner for you and for the device you are using to access the website;
- iii. to allow you to participate in any interactive features of our Services, when you choose to do so;
- iv. as part of our efforts to keep our website and apps safe and secure;
- v. to measure or understand the effectiveness of any advertising we serve to you and others, and to deliver relevant advertising to you;
- vi. to make suggestions and recommendations to you and other users of our site about goods or Services that may interest you or them.

(c) Information we receive from other sources

- i. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

7. What is our legal basis for processing your personal data?

- 7.1. Generally, where we process personal data about you, it will be to comply with our agreement with you to provide services via our website and Twig app. The legal basis for the processing of personal data for such purposes is therefore “contract”: the processing is necessary for a contract we have with you or as a precursor to entering

into that contract. This applies to processing to carry out our obligations arising from contracts entered into between you and us and to provide you with the information and Services that you request from us. It is also the basis for using your personal data to inform you about changes to the Services.

- 7.2. Some of our processing, such as the anonymisation of your personal data prior to providing aggregate usage information to retailers, product manufacturers and others, relies on the legal basis of our “**legitimate interests**”: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your Personal data which overrides those legitimate interests. Our legitimate interest here is the need to sell anonymised, aggregate usage and item resale information as a means of offering you a higher price on your used items than we could without the sale of such information.
- 7.3. Our processing of your personal data to provide you with information about other services we offer that are similar to those you have already purchased or enquired about is based on our legitimate interest in keeping you informed of services that might be of interest to you, and in helping us achieve our public mission of reducing waste.
- 7.4. Our use of your personal data to ensure that content from our app and website is presented in the most effective manner for you and the device you are using to access the app or website is based on our legitimate interest in making our services as intuitive and user-friendly as possible.
- 7.5. Where we process your personal data to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you, that will be based on your consent, which can be withdrawn at any time by contacting us at support@twigcard.com.

8. Will Twig share any of my Personal Data it receives?

- 8.1. We may share your Personal data with third parties as described in this section:
Information that’s no longer personally identifiable
- 8.2. We may anonymise your Personal data so that you are not individually identified and provide that information to our partners. We may also provide aggregate usage information to our partners, who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal customer experience. However, we never disclose aggregate usage information to a partner in a manner that would identify you personally.

- 8.3. We may use third party analytics services, such as Mixpanel, Facebook and Google Analytics, to grow our business, to improve and develop our Services, to monitor and analyse use of our Services, to aid our technical administration, to increase the functionality and user friendliness of our Services, and to verify that users have the authorization needed for us to process their requests. These services may collect and retain some information about you.
- 8.4. You can opt-out of Mixpanel's automatic retention of data collected while using our Services by visiting <https://mixpanel.com/optout/>. If you get a new computer, install a new browser, erase or otherwise alter your browser's cookie file (including upgrading certain browsers), you may clear the Mixpanel opt-out cookie, and you will need to re-visit the opt-out page. Note that Mixpanel's opt-out cookies will not stop us from sending other data about you from our servers to Mixpanel, nor will it prevent any other data collection methods. To learn more about the Privacy Policy of Mixpanel, visit <https://mixpanel.com/privacy/>.
- 8.5. Google Analytics collects the IP address assigned to you on the date you use the Services, but not your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with your personal data. Although Google Analytics plants a persistent cookie on your web browser to identify you as a unique user the next time you use the Services, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your use of the Services is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You may find additional information about Google Analytics at www.google.com/policies/privacy/partners/. Finally, you can opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>.

(a) Supplier Businesses

Occasionally your full legal name and IBAN might be shared with IT and delivery suppliers to help us provide our services to you. Additionally, our banking and financial-services partners and payments networks, including Visa and Mastercard, might require this info. This includes banking and lending partners, banking intermediaries and international payment service providers.

(b) Affiliated Businesses

In certain situations, businesses or third party websites we're affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognise when an affiliated business is associated

with such a transaction or service, and we will share your personal data with that affiliated business only to the extent that it is related to such transaction or service; for example, when you choose to take an action with regard to a particular item you purchased from a participating retailer, we may share that information with that participating retailer, or when you elect to resell an item through a third party resale marketplace such as eBay, we will provide that marketplace with the information they need to perform the transaction and pay you the proceeds. **We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to a participating retailer or an affiliated website or business, please review all such businesses' or websites' terms and conditions and privacy policies.**

(c) Agents

We employ other companies and people to perform tasks on our behalf as part of any contract we enter with you and need to share your information with them to provide products or services to you. For example, if you want to sell or donate products that are registered with the Services, we may share certain information with third parties that arrange such resale or donation. Unless we tell you differently, our agents do not have any right to use the personal data we share with them beyond what is necessary to assist us.

(d) Twig User Profiles and Submissions

Certain user profile or account information, including your name, **Twig User ID**, and any video or image content that you have uploaded to the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for the Services. **Please remember that any content you upload to your public user profile, along with any personal data or content that you voluntarily disclose online in a manner other users can view (on discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by anyone.** Your Twig User ID may also be displayed to other users if and when you transfer products to them, send messages or comments, or upload images or videos through the services, and other users may be able to contact you through messages and comments. Additionally, if you sign into the Services through a third party social networking site or service, your list of “friends” from that site or service may be automatically imported to the Services, and such “friends”, if they are also registered users of the Services, may be able to access certain non-public information you have entered in your Services user profile or account. Again, we do not control the policies and practices of any other third party site or service.

(e) Business Transfers

In the event we choose to buy or sell any business or assets, we may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, personal data could be one of the assets transferred to or acquired by a third party.

(f) Protection of Twig and Others

We reserve the right to access, read, preserve, and disclose any information we believe is necessary to comply with law or court order; enforce or apply our [Terms and Conditions](#) and other agreements; respond to claims that any content violates the rights of third parties; or protect the rights, property, or safety of Twig, our employees, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

9. How do you keep my personal data secure?

9.1. Your account is protected by a password and/or other sign-on mechanism for your privacy and security. If you access your account via a Third Party site or service, you may have additional or different sign-on protections via that Third Party site or service. **You must prevent unauthorised access to your account and personal data by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.**

9.2. We endeavor to protect the privacy of your account and other personal data we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. Once we have received your personal data, however, we will use strict procedures and security features to try to prevent unauthorised access.

10. Where do we store your Personal data?

10.1. The data we collect from you may be transferred to, and stored at, a destination outside the United Kingdom and outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us, or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Twig will take all reasonably necessary steps to ensure your personal data is treated securely and in accordance with this Privacy Policy and applicable data protection legislation.

- 10.2. Some of our external third parties are based outside the United Kingdom and EEA, so their processing of your personal data will involve a transfer of data outside the United Kingdom and EEA. Whenever we transfer your personal data out of the United Kingdom and EEA to third parties, we will take all reasonable steps to ensure an equivalent degree of protection is afforded to by this Privacy Policy and relevant data protection laws.
- 10.3. Please contact us at support@twigcard.com if you want further information on the specific mechanism used by us when transferring your personal data out of the United Kingdom or EEA.
- 10.4. 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 personal data, we will use strict procedures and security features to try to prevent unauthorised access.

11. What personal data can I access?

- 11.1. You may access, delete and, in some cases, edit the following information you have provided to us:
- (a) UserID;
 - (b) Name;
 - (c) Email address;
 - (d) Mailing address;
 - (e) Mobile phone number;
 - (f) Third Party retailer club or membership numbers;
 - (g) User profile or account information, including images, messages and comments you have uploaded to or transmitted through the Services.
- 11.2. The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at support@twigcard.com.
- 11.3. You have rights under certain circumstances in relation to your personal data. These include the rights:
- (a) of access to information held about you without charge;
 - (b) to erasure of your personal data;
 - (c) to object to processing of your personal data;
 - (d) to request restriction of processing of your personal data;

- (e) to the transfer of your personal data; and
 - (f) the right to withdraw your consent, where consent is relied upon as the legal justification for processing.
- 11.4. Once we provide an international service, we may need to transfer your personal data outside the United Kingdom or European Economic Area (EEA) in order for us to provide our services. For example, if you ask to make an international payment, we will send funds to banks outside of the United Kingdom or EEA. We might also send your personal data outside of the United Kingdom or EEA to keep to global legal and regulatory requirements and to provide ongoing support services.
- 11.5. We may share your personal data with credit-reference agencies and fraud-prevention agencies that are based outside of the United Kingdom or EEA. We will take all reasonable steps to make sure that your personal data is handled securely and in line with this privacy policy and data protection laws. If you require notice of the information held about you or wish to exercise any of the other rights, please submit a written request to support@twigcard.com.
- 11.6. 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.
- 12. What choices do I have?**
- 12.1. You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.
- 12.2. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your personal data to any third party for such purposes.
- 12.3. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at support@twigcard.com. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these

websites.

12.4. You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. Please note that we may be required (by law or otherwise) to retain your account information or any other information associated with it and not delete it (or to keep this information for a certain period of time, in which case we will comply with your deletion request only after we have fulfilled such requirements). Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporate your personal data after you update or delete it, but not in a manner that would identify you personally. We may also be required to keep certain personal data about you (such as an email address) in order to ensure we comply with a request from you not to be contacted, for example.

13. Do you use cookies to analyse how we use your website?

As explained in the information we collect we do use cookies. Please read our [Cookies Policy](#) for more information on cookies.

14. How long will you keep my data?

We will generally keep your data for six (6) years after our business relationship with you ends or such period as may be required by applicable local laws. Please note we are required to keep your personal data for as long as anti-money laundering and E-money laws require or if we have an ongoing dispute.

15. What if I have questions about this Privacy Policy?

If you have any questions or concerns regarding our Privacy Policy, please send us a detailed message to support@twigcard.com and we will try to resolve your concerns. If you have any complaints, these should be addressed to our Data Protection Officer at support@twigcard.com or the Information Commissioner's Office (ICO). The ICO helpline is on 0303 123 1113 or you can visit the ICO website for further information at <https://ico.org.uk>.