

PRIVACY POLICY

Last updated October 8, 2022

This Privacy Policy describes how Equip Financial Technology B.V. collects and uses your personal data that you provide in connection with products and services Equip provides, including the Equip website at www.equip.money (the “Platform”) and the Equip App when released. In this Privacy Policy, the above are referred to collectively as the “Services”. As a financial services company we have an important responsibility to protect the data you share with us and ensure your privacy is maintained. This policy describes the choices available to you regarding our use of your personal data and how you can access and update this data. Services include software and services that we own and operate directly, as well as software and services that we market or provide from or on behalf of third parties. We are only allowed to do what we outline in this document with your consent, so by agreeing to this Privacy Policy you are consenting for us to collect, store and use your data as we describe below.

Who are we?

We are Equip Financial Technology B.V. (“we”, “our”, “us”) and operate under the name of Equip. We’re committed to protecting and respecting your privacy. If you have any questions about your personal information please email us at support@equip.money

We are registered with the Dutch Chamber of Commerce (Kamer van Koophandel) under registration number 86747606.

What information we hold about you

Information you give us through the web platform and our Services:

- Information submitted through our platform – for example, when you sign up to the platform and provide details such as your name and email address, or details we collect about how you use the app and website
- Information you give us through Equip messaging chat

- Information you share with your coach which is logged in notes, objectives or actions within the platform
- Information which is tied to your usage or settings on your device - for example, the mobile network you use, your IP address or operating system
- Information you give us explicit permission to access from your device such as your address book, photos, geolocation and data from your camera
- Information from any online account that you share with us
- Answers you give to surveys about Equip and our Services
- Recordings of your coaching session. To ensure that your Coach is complying with their obligations, we will carry out ongoing monitoring and compliance case checks which may involve a member of the Equip compliance team reviewing video recordings and/or written communications.

Information your employer gives us

- Information passed to us from your employer such as your name and email address

Information we collect from your device

We may collect information to help improve our features and also to ensure we keep your data safe, this could include:

- Operating system and mobile network to analyse performance and bug issues
- IP address and ID
- Location to help protect you against fraud

Information we collect or generate if you get in touch

If you contact Equip through any other way than the platform, we collect the following information so we can best help you in a prompt manner:

- The phone number or email address you are reaching out to us on and the content of the conversation or email

How we use this information

We understand that you are sharing personal information with us. We are committed to not taking more than we need as well as keeping safe what we do take. Any use of personal data is done in compliance with data laws and GDPR. Our aim is to only collect data we need to enable us to best serve your needs. This may include enabling us to:

- Provide our Services including financial guidance and coaching
- Help manage your account
- Track, analyse and improve the services we provide you and other customers (our online platform, coaching service and customer service)
- Prevent illegal activities like money-laundering and fraud
- Market and communicate our products and Services and those of affiliated partners where we think these will be of interest to you. You can always unsubscribe from receiving these if you want to, by email and via the platform.
- Confirm your identity when you sign up or get in touch
- Investigate and resolve complaints and other issues
- For training, monitoring and quality control and to ensure that the service we provide to you meets your needs and our standard of care

Who will we share it with?

We may disclose your personal information to:

- Anyone who works for us, including but not limited to our financial coaches
- Certain organisations that support our product
- Certain authorities to detect and prevent terrorism
- Anyone who you give us explicit permission to share it with or if we must disclose your personal data to comply with the law, or to enforce our Terms of Service or other agreements; or to protect the rights, property, or safety of us, our customers, or others.

We will never share any of your personal or identifiable information with your employer, nor will we share any of the content of your interaction with Equip.

We will share an (aggregated, i.e. not personal or identifiable) overview of usage, user satisfaction and common themes that are shared across your organisation. For example, this could be a % of users that want to talk to their coach about the upcoming changes to the Dutch pension system. This would then indicate to your employer that additional guidance is needed to cover this topic.

We will always have an agreement in place with any third parties with whom we share your personal information. In all circumstances they will be obliged to keep your data safe and up to date and to delete it immediately upon our request.

Cookies

We use cookies, including individual identifiers, to improve the user experience within the Equip platform and we do not share any individually identifiable information with any third party, including your employer, unless you have given us explicit permission.

Rights

Naturally, you are the owner, and have control, of your own data. Therefore you have the following rights:

- **The Right to be informed.** In other words, you have the right to know how your data is collected and used. This is what this document is for, but also you can always email us at support@equip.money to clear anything up.
- **The Right of Access.** You have the right to ask for, and receive, a copy of the personal data we hold about you.
- **The Right to Rectification.** Basically, if something is wrong we will change it.
- **The Right to Erasure.** Simple - we will delete whatever you want us to delete.
- **The Right to Restriction of Processing.** This is an alternative method to erasing your data - you can ask to restrict any usual processing of your data. This could mean moving it to a separate system so it doesn't go through our normal processes.
- **The Right to Data Portability.** If you ever want to use the data that we hold for something else, then you can.

- **The Right to Object.** You are always able to object to any of the ways we handle your data. Just let us know.

To exercise any of your rights or if you have any questions relating to any of the above, please contact us by reaching out to us via support@equip.money

Similarly, you can withdraw your agreement to this privacy policy at any time by emailing support@equip.money. If you do this we'll be in touch as soon as possible, as we will need to close your account.

Our other obligations

Here's some other stuff that's important to us, and we think it's important you understand it too.

- We won't share identifiable personal data with third parties for their direct marketing unless you have given us explicit permission
- We will only keep your personal information for only as long as we need to. We'll then delete it securely and safely
- There may be times when you give us sensitive information on your own accord, such as your information on your health. We'll only use this information in strict accordance with the law.

Where your data is stored

The data we collect from you may be transferred to and stored somewhere outside the European Economic Area ("EEA"). It may also be processed by staff outside the EEA who work for us or one of our suppliers. This isn't cause for concern - we always make sure that the adequate controls are in place to ensure your data is stored securely. As always, you can email support@equip.money to understand more.

Changes to this policy

Any material changes we make to our privacy notice in the future will be posted on the privacy policy page of our website and, if we think you really should know about it, sent to you by email.