

# Privacy Policy:

## 1. About us

We are GenToo Ltd., a company registered in the Republic of Ireland (a European Union member state) with company code 780522, and with a registered address at First Floor, Penrose 2, Penrose Dock, Cork, T23 Y09.

This Privacy Policy is governed by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "**General Data Protection Regulation**" or "**GDPR**") and by the "Spanish Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights" (the "**LOPDGDD**").

We process your personal data in accordance with the principles established by the General Data Protection Regulation (GDPR) and the LOPDGDD, including:

- Lawfulness, fairness, and transparency: We process your data lawfully, fairly, and in a transparent manner.
- Purpose limitation: We collect your data for specified, explicit, and legitimate purposes and do not process it in a manner incompatible with those purposes.
- Data minimisation: We only collect data that is adequate, relevant, and limited to what is necessary.
- Accuracy: We take reasonable steps to ensure your data is accurate and, where necessary, kept up to date.
- Storage limitation: We keep your data in a form which permits identification for no longer than necessary.
- Integrity and confidentiality: We process your data in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

## 2. Why do I need to read this notice?

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. It does not include information where the identity has been removed (anonymous data).

As the data controller, GenToo provides you with this Privacy Policy to inform you about the processing of the personal data we collect from you when you use:

- our website at [www.gentoo.es](http://www.gentoo.es);
- the GenToo mobile app; or
- any of the services you can get access to through the GenToo app or website (our services).

The overview below explains, as required by Article 13 of the GDPR, what information we collect, how we use it, and your rights.

If you have concerns about how we use your personal data, you can contact our data protection officer at [dpd@gentooapp.com](mailto:dpd@gentooapp.com).

## 3. What about changes to my personal information?

We keep this notice under regular review. This version was last updated on 20/02/2026.

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.

#### 4. What about links to third-party websites?

This website 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 information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### Your personal data

#### 5. What information do you collect about me?

We may collect, process, store and transfer different types of personal data about you. The table below explains what personal data we collect.

Type of information	Details
Information you provide to us	We collect information you provide when you:
	✓ fill in any forms;
	✓ correspond with us;
	✓ register to use the GenToo app;
	✓ open an account or use any of our services;
	✓ take part in online discussions, surveys or promotions;
	✓ speak with a member of our customer support team (either on the phone or through the GenToo app);
	✓ enter a competition; or
	✓ contact us for other reasons.
	We collect the following information:
	✓ Your name, address, and date of birth.

	<p>✓ Your email address, phone number and details of the device you use (for example, your phone, computer or tablet).</p>
	<p>✓ Your username, password and other registration information.</p>
	<p>✓ Details of your bank account, including the account number, sort code and IBAN.</p>
	<p>✓ Identification documents (for example, your passport or driving licence number), copies of any documents you have provided for identification purposes, a personal description (if you provide one), and any other information you provide to prove you are eligible to use our services.</p>
	<p>✓ Records of our discussions, if you contact us or we contact you.</p>
	<p>✓ Your photo (only if you upload one).</p>
Information from your device	<p>Whenever you use our website or the GenToo app, we collect the following information:</p>
	<p>✓ 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 and so on.</p>
	<p>✓ 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.</p>
	<p>✓ 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, 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.</p>

	✓ Information stored on your device, including if you give us access to contact information from your address book, log-in information, photos, videos or other digital content, check-ins (sometimes, we call this content information). The GenToo app will regularly collect this information in order to stay up to date.
Information from others	We collect information from third parties, such as credit-reference agencies, fraud-prevention agencies and partners who help us to provide our services.
	This includes your credit record, information to help us check your identity, and information relating to your transactions.

## 6. What if I fail to provide you with my 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 (for example, to provide you with our services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

## 7. What is your legal basis for using my information?

We must have a legal basis (a valid legal reason) for processing your personal data. Our legal basis will be one of the following.

- Keeping to our contracts and agreements with you

We need certain personal information to provide our services, and cannot provide them without this information.

- Legal obligations

In some cases, we have a legal responsibility to collect and store your personal information (for example, under money-laundering laws, we must hold certain information about our customers).

- Legitimate interests

We sometimes collect and use your personal data, or share it with other organisations, because we or they have a legitimate reason to have it, and this is reasonable when balanced against your right to privacy.

- Consent

Where you've agreed to us collecting your information, for example, by using the GenToo app or when you have ticked a box to indicate you are happy for us to process your personal data in a certain way.

## 8. For what purposes do we process your personal data? What are the applicable legal bases in each case?

We collect and process your personal data so we can provide the best service, tell you about products and services you may be interested in, and meet our legal obligations.

- Providing our services

Whenever you apply for a product or service, we may process your personal data to carry out a credit check and/or underwriting to better understand your financial circumstances and repayment history and decide whether or not to approve your application. For this purpose, we will consult the information received from credit-reference agencies and partners who help us to provide our services. The applicable legal basis for this processing will be your consent. You can withdraw your consent at any time by exercising your data subject rights, as provided in section [12](#) of this Privacy Policy.

If you are already a GenToo customer, we use your personal data to meet our obligations relating to any transactions you make (for example, making payments into and out of your GenToo account, withdrawing cash or making payments with your GenToo Card). If you ask us to exchange the currency of the e-money you hold in your GenToo account, we'll use your personal data to help us do that. The applicable legal basis for this processing will be the performance of the contract between you and us. We also process your personal data to contact you by phone and provide you with customer support services. We may record these calls, but only for internal training and quality-control purposes. The applicable legal basis for this processing will be the performance of the contract between you and us.

- Protecting against fraud

We process your personal data to check your identity to protect against fraud, to comply with financial crime laws and to confirm that you are eligible to use our services. We also process it to help us better understand your financial circumstances and manage fraud risks related to your GenToo account. The applicable legal basis for this processing will be GenToo's legitimate interests in developing and improving our approach to financial crime, as well as compliance with legal obligations.

- Credit information systems

We may include your personal data in common credit information systems, specifically the BADEXCUG and FIJ databases managed by Experian, in cases of unpaid debts or credit defaults. We will notify you of the inclusion of such data and inform you about the possibility of exercising the rights established in Articles 15 to 22 of Regulation (EU) 2016/679 within thirty days following notification of the debt to the system. Your data will remain blocked during this period. The applicable legal basis for this processing will be GenToo's legitimate interests in managing credit risk, debt recovery, and maintaining accurate credit records.

As a creditor, GenToo may also consult data relating to you in the BADEXCUG and FIJ common credit information systems managed by Experian to assess creditworthiness and manage financial risk. The applicable legal basis for this processing will be GenToo's legitimate interests in making informed lending decisions and preventing fraud.

- Marketing and providing new products and services that might interest you

We process your personal data for the following purposes.

- Provide you with information about other goods and services we offer that are similar to those you have already used or asked about. The applicable legal basis for this processing will be GenToo's legitimate interests.
- Provide you with information about our goods or services, and our partner's promotions or offers, which we think you might be interested in. To help us do this, we may process information about you to help us better understand your interests. You can opt out of this by using the help service through the GenToo app or by emailing our Data Protection Officer at the address given above. The applicable legal basis for this processing will be your consent.
- If you agree, allow our partners and other organisations to provide you with information about their goods or services. The applicable legal basis for this processing will be your consent.
- Measure or understand the effectiveness of our advertising, and provide relevant advertising to you. The applicable legal basis for this processing will be GenToo's legitimate interests.
- Process applications for products and services available through us, and make decisions about whether to approve applications. The applicable legal basis for this processing will be the performance of the contract between you and us, and where applicable, the compliance with legal obligations.

Remember, for those data processing activities based on consent, you can withdraw your consent to stop us sending you marketing information by adjusting your marketing choices (the "How do you process my personal data for marketing purposes?" section below explains how to do this).

- To keep our services up and running

We process your personal data to manage our website and the GenToo app, (including troubleshooting, data analysis, testing, research, statistical and survey purposes), based on our legitimate interests in operating and improving our services, and to make sure that content from our website is presented in the most effective way for you and your device. For more information, please see our Cookies Policy.

We also use your personal data to allow you to take part in interactive features of our services, to tell you about changes to our services, and to help keep our website and the GenToo app safe and secure. The applicable legal basis for this processing will be the performance of the contract between you and us and GenToo's legitimate interest in protecting our systems and users from fraud and security threats.

- Helping with social interactions

We process your personal data to help social interactions through our services or to add extra functions in order to provide a better experience. The applicable legal basis for this processing will be your consent where such features require access to additional personal data (such as your location), and our legitimate interests in enhancing user experience, improving service functionality, and fostering user engagement. You may withdraw your consent at any time.

## 9. What if you change the basis or purpose for which you have collected my personal information?

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.

If we need to process your personal data for an unrelated purpose, we will notify you, and we will explain the legal basis which allows us to do so.

## 10. How do you process my personal data for marketing purposes?

If you sign up to our services, we will assume you want us to contact you by post, email and phone (including text message) with offers and promotions. We may use the data we collected about you in order to tailor our offers.

You can adjust your preferences, or tell us you don't want to hear from us, at any time. You can also toggle in-app notifications, and/or click on 'unsubscribe' when we send you marketing emails.

We won't pass your details on to any organisations outside the GenToo group of companies for their marketing purposes without your permission. You can find out more in the "Do you share my information with anyone else?" section.

## Your rights

### 11. What are my rights?

Your right	What it means
Right to be informed (Articles 13-14 of the GDPR)	We provide this privacy notice to explain how we use your personal data.
Right of access (Article 15 of the GDPR)	You can ask to see the personal data we hold about you (this is called making a 'data subject access request', or DSAR for short). You can also ask for information about what data we process, why we process it, who we share it with, and how long we keep it. If you make a DSAR, we will provide a copy of the personal data we hold about you within one month. We cannot give you any information about other

	people, information which is linked to an ongoing criminal or fraud investigation, or information which is linked to settlement negotiations with you. We also will not provide you with any communication we've had with our legal advisers.
Right to rectification (Article 16 of the GDPR)	You can ask us to correct your personal data if you think it's wrong or incomplete. Before we update your file, we may need to check the accuracy of the new information you have provided.
Right to erasure (Article 17 of the GDPR)	You can ask us to delete your personal data if:
	✓ there's no good reason for us to continue using it;
	✓ you gave us consent to use the information and you have now withdrawn that consent;
	✓ you have objected to us using the information and we have no overriding legitimate grounds;
	✓ we have used the information unlawfully; or
	✓ the law requires us to delete the information.
Right to object (Article 21 of the GDPR) - Marketing	You can tell us to stop using your personal data for marketing at any time.
Right to object (Article 21 of the GDPR) - Legitimate interests	If our legal basis for using your personal data is 'legitimate interests' and you disagree with us processing it, you can object.
	However, if there is an overriding reason why we need to use the information (for example, legal reasons), we will not accept your request.
	If you object to us processing personal data which we need in order to provide our services, we may need to close your account, as we won't be able to provide the services.
	If you object to us sending your personal information to our partners, such as open banking providers, for example (as part of our cash advance feature), we may no longer be able to provide you with those services.
Right to restrict processing (Article 18 of the GDPR)	You can ask us to suspend using your personal data if:

	✓ you want us to investigate whether it is accurate;
	✓ our processing of the data is unlawful, but you do not want us to delete it;
	✓ we no longer need the data, but you want us to continue holding it for you in connection with a legal claim; or
	✓ you have objected to us processing your data, but we need to check whether we have an overriding reason to use it.
Right to data portability (Article 20)	If we can, and are allowed to do so under regulatory requirements, we will provide your personal data in a structured, commonly used, machine-readable format so you can transfer it to another service provider. This right only applies where processing is based on consent or contract performance and is carried out by automated means.
Right to withdraw consent (Article 7 of the GDPR)	If you have given us consent to use your personal data, you can withdraw your consent at any time by changing your settings in the GenToo app or sending an email to <a href="mailto:dpd@gentooapp.com">dpd@gentooapp.com</a>
Rights related to automated decision-making and profiling (Article 22 of the GDPR)	You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects or similarly significantly affect you. If we use automated decision-making for KYC or credit decisions for e.g., you have the right to obtain human intervention, express your point of view, and contest the decision.
	Please note, it would have been lawful for us to process the personal data up to the point you withdrew your consent.

## 12. How do I exercise my rights?

To exercise any of your rights set out in the previous section, you can contact us through the GenToo app or send us an email at [dpd@gentooapp.com](mailto:dpd@gentooapp.com). If you are unhappy with how we have handled your personal data, you can complain at any time to the Spanish Data Protection Agency (AEPD), the Spanish supervisory authority for data protection issues ([www.aepd.es](http://www.aepd.es)). We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please do contact our data protection officer at [dpd@gentooapp.com](mailto:dpd@gentooapp.com) first.

## 13. Do you share my information with anyone else?

We share your personal data with some of the GenToo suppliers in order to provide you with the best service. For example, we may share your personal data with our card issuer in order to manufacture your cards. The table below explains which suppliers we normally share your personal data with.

We may share your personal data with our partners in order to provide you with certain services you have asked us for. If you are a retail customer, we may share your personal data with our partners (through the GenToo for Retail API) when you switch this function on through GenToo Connect.

Partners who help to provide our services may include:

Type of supplier	Why we share your data
Suppliers who provide us with IT, payment and delivery services.	To help us provide our services to you.
Our banking and financial services partners and payments networks, including Visa and Mastercard.	To help us provide our services to you, this includes banking and lending partners, banking intermediaries and international payment-service providers.
Card manufacturing, personalisation and delivery companies.	To create and deliver your personalised GenToo Card.
Advertisers.	To promote our services (we provide anonymous, non-sensitive information only).
Analytics providers and search information providers.	To help us improve our website or app.
Customer-service providers, survey providers and developers.	To help us provide our services to you.
Communications services providers.	To help us send you emails, push notifications and text messages.
Credit-reference and fraud-prevention agencies.	To help us develop and offer credit products to you, and to check your identity and your eligibility for credit products.

## GenToo and your personal data

### 14. Will my information go outside the European Economic Area?

As we provide an international service, we may need to transfer your personal data outside the European Economic Area (EEA) in order for us to provide our services. Any such transfers will be carried out in compliance with Chapter V of the applicable provisions of the GDPR and the LOPDGDD, and we will ensure that appropriate safeguards are in place, such as the use of Standard Contractual Clauses or transfers to countries with an adequacy decision from the European Commission.

For example, if you ask to make an international payment, we will send funds to banks overseas. We might also send your information overseas to comply with global legal and regulatory requirements and to provide ongoing support services.

We may share your personal data with credit-reference agencies and fraud-prevention agencies outside the EEA. We will take all reasonable steps to make sure that your personal data is handled securely and in line with this privacy notice and data-protection laws.

If you would like more information, please contact us through the GenToo app or by sending an email to [dpd@gentooapp.com](mailto:dpd@gentooapp.com)

## 15. How long will you keep my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data duly blocked for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. You have the right to redeem (ask us to return) your e-money for up to ten years after your GenToo account is closed. We will therefore generally hold your data for this long.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case it will not be considered personal data anymore, and we may use this data indefinitely without further notice to you. In some cases, you can ask us to delete your data: see "Your Rights" above for further information.

## 17. How will you keep me updated on how you use my data?

If we change the way we process your personal data, we will update this notice and, if appropriate, let you know by text message, by email, through the GenToo app or through our website.

## 18. Cookies

We use cookies to analyse how you use our website. Please read the Cookies Policy for more information about cookies.