

oohMoolah Privacy Notice

Version 3.0.0
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Introduction

This Privacy Notice applies to the account information services offered by Perfect Data Solutions Limited t/a oohMoolah ("PDS") and to your use of our open banking product hosted or made available by us, wherever and however you access them ("the Service"). To a lesser extent this Privacy Notice applies to any visitor to our oohMoolah website (where the level of interaction with personal data and the amount of data processing will be much less). If you are a retail customer of a PDS client, their data governance and privacy practices also apply. For more information on their practices, please refer to their applicable terms and conditions and privacy notice.

This Privacy Notice explains the purposes and legal bases upon which PDS (company number 07407815) collects, processes, stores and shares data that can identify you. We reserve the right to publish different versions of this Privacy Notice to suit different products, services or websites.

PDS has its registered office at 1650 Parkway, Whiteley, Fareham, Hampshire PO15 7AH. We are registered with both the Information Commissioner (ICO) (No. Z2756934) and the Financial Conduct Authority ("FCA") (FRN 802559).

This website is owned and operated by PDS. Together with our website Terms and Conditions ("the Terms"), this Privacy Notice forms our agreement with you.

What is Open Banking?

Open Banking is the secure way of providing access to a bank, building society or payment account provider that publishes Read/Write APIs to permit, with a customer's consent, payments initiated by third party providers and/or make their customers' account transaction data available to third party providers via their API end points (known as Account Servicing Payment Service Providers ("ASPSP")). These interactions are facilitated using access tokens, which are short-lived, secure tokens that grant third-party providers (such as PDS) temporary access to a customer's bank account data.

Registered providers and participating ASPSPs are enrolled in the Open Banking Directory. Further information about Open Banking is available from www.openbanking.org.uk.

You may access our open banking product directly through oohMoolah or through clients of PDS whose platform is powered by oohMoolah.

By using the Service, you duly authorise PDS as a designated Account Information Services Provider ("AISP"), to access your account transaction data (via the Read API end point only) acting on instructions from you and transfer the same to your Credit Provider for the purpose of their own credit risk assessment, credit application assessment and associated financial services activities.

What is personal data?

Personal data, or personal information, means any information that we could use to identify you, directly or indirectly, and any information that relates to you. Data Protection law only applies to personal information.

Who is responsible for your personal data?

When PDS provides account information services as a designated AISP to provide account transaction data from your ASPSP to another ASPSP or financial institution ("Credit Provider") acting on instructions from you to perform an account information search, PDS acts as a data controller and is responsible for your personal data. Your Credit Provider is a separate and independent data controller and also responsible for your personal data.

When PDS acts on the instructions of a Credit Provider, such as handling technical issues, we also act as a data processor.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO by sending an email to DPO@lendingmetrics.com or via the contact information below.

What types of personal data do we collect?

We collect, use and hold many different kinds of personal data. Some of this information we may have received directly from you, or we may receive it from your ASPSP.

General Website Visitor

Type of personal data	Description
Contact	Your name, email address and any other personal data you supply to us through forms you complete (such as any feedback or messages via our Ask us a question page).
Technical	Any personal data we collect as part of your cookies setting. These include IP address/location, browser type and version, page views and searches.

Account Information Service User

Type of personal data	Description
Identification	Your first name, surname, data of birth, application reference, banking user ID.
Contact	Your postal address, email address, telephone number and any other personal data you supply to us via the Service.
Account Details	Account name, account nickname, sort code, account number, balance, overdraft, account type, account features/benefits.
Transactions	Details about payments to and from your account, including your income, credits, charges, fees, interest, payment history, regular payments, payee name, outgoings, memberships, transaction references (text entered with the payment).
Technical	Any personal data we collect as part of your cookies setting. These include IP address/location, browser type and version, page views and searches.

If you fail to provide personal data

We require you to provide certain information to enable us to perform the Service. If you choose not to provide the information, we will be unable to successfully perform an account information search. We will inform you at the point of collecting information from you whether provision of the personal data is optional.

How we use your personal data?

We will only use your personal data when we have a proper reason to do so. Data protection legislation (including the Data Protection Act 2018 and the UK General Data Protection Regulation 2016) says we must have one or more of the following reasons:

- When you consent to it, such as during the open banking customer journey when using the Service.
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal duty or obligation, such as the Payment Service Regulation 2017.
- To fulfil a contract that we have with you.
- When it is in the public interest.

We will not collect or use special categories of personal data without your consent unless the law allows us to do so. If we do, this data may be obtained directly from you with your consent (such as data contained within an account information search) or when it is necessary to establish, exercise or defend legal claims or for reasons of substantial public interest.

The following is a list of the ways we may use your personal data and which of the reasons we rely on to do so.

General Website Visitor

Type of personal data	Purpose of Processing	Lawful Basis Relied Upon
Contact	To record any feedback messages received and provide you with a response.	For our legitimate interests, such as developing the Service or managing our relationship with you. It is in our mutual interest to respond (Article 6(1)(f) UK GDPR).
	To respond to any subject access requests.	Where we need to comply with a legal obligation (Article 6(1)(c) UK GDPR). For our legitimate interests, such as improving how we fulfil our legal and contractual duties, or where we may be asked to disclose our rights requests record (Article 6(1)(f) UK GDPR).
Technical	To allow us to run the operation of our websites, domains, portals, and ensure that our provision of the Service runs efficiently.	For our legitimate interests to improve the Service and ensure that the website functions correctly (always balanced against your fundamental rights and freedoms) (Article 6(1)(f) UK GDPR).

Account Information Service User

Type of personal data	Purpose of Processing	Lawful Basis Relied Upon
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Identification Contact Account Details Transactions	<p>To allow us to perform an account information search.</p> <p>To allow us to share your personal data with your Credit Provider.</p>	<p>With your consent where legally required (Article 6(1)(a) UK GDPR).</p> <p>The processing is necessary for PDS to perform a contract with you (Article 6(1)(b) UK GDPR).</p> <p>Where we need to comply with a legal obligation to verify your identity (Article 6(1)(c) UK GDPR).</p> <p>To comply with our legal obligations (such as under the Payment Service Regulations 2017) (Article 6(1)(c) UK GDPR).</p> <p>For our legitimate interest in ensuring that we can provide you (or your Credit Provider) with the Service and to continuously improve our Service (Article 6(1)(f) UK GDPR).</p> <p>If the search processes information that constitutes sensitive personal data (e.g. from your account transaction data), our processing takes place based on your explicit consent (Article 9(2)(a) UK GDPR).</p>
Identification Contact	To record any feedback messages received and provide you with a response.	For our legitimate interests, such as developing the Service or managing our relationship with you. It is in our mutual interest to respond (Article 6(1)(f) UK GDPR).
Identification Contact	To respond to any subject access request and give you information we hold about you.	<p>Where we need to comply with a legal obligation (Article 6(1)(c) UK GDPR).</p> <p>For our legitimate interests, such as improving how we fulfil our legal and contractual duties or where we may be asked to disclose our rights requests record (Article 6(1)(f) UK GDPR).</p>
Identification Contact	To respond to your request to disable an oohMoolah access token.	With your consent (Article 6(1)(a) UK GDPR).
Transactions	To anonymise your personal data in order to improve our services and categorisation	For our legitimate interests of product development (Article 6(1)(f) UK GDPR).
Technical	To ensure network and information security in the Service	For our legitimate interests in ensuring good information security (Article 6(1)(f) UK GDPR).
Technical	To allow us to run the operation of our websites, domains, portals, and	With your consent obtained through the Terms (Article 6(1)(a) UK GDPR).

	ensure that our provision of the Service runs efficiently.	For our legitimate interests to improve the Service and ensure that the website functions correctly (always balanced against your fundamental rights and freedoms) (Article 6(1)(f) UK GDPR).
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Change of purpose

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 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.

Sharing of personal data with third parties

We may share your personal data with your Credit Provider as part of your application for credit with that third party. In order to engage with a Credit Provider, you may be required to enter into contracts with them and accept additional privacy policies which are specific to them. We only disclose personal data for the purposes detailed in this Privacy Notice.

We may also share your personal data where necessary with the following parties for the purposes set out in this Privacy Notice:

- With other companies in our corporate group (such as LMX HoldCo Limited and LMX BidCo Limited).
- Regulators and supervisory authorities.
- Law enforcement agencies if required by law.
- Third party vendors who help us manage and maintain our IT infrastructure, such as our cloud storage providers and data centre hosts.
- Professional advisors including solicitors, accountants and insurers who provide us with professional services.
- Third party auditors or consultants if required for compliance, risk management or auditing purposes.

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.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Access to your personal data

When authorising PDS to access your account transaction data, we will by default have this access for 90 days. This is the standard period implemented by ASPSPs under the second Payment Service Directive ("the PSD2"), in force from 13 January 2018. Notwithstanding, unless your Credit Provider instructs us to perform a refresh search, we will not access your account after completing the account information search on your instructions. If you wish to revoke the access token, please contact your ASPSP directly or email info@oohMoolah.com.

Please note, in circumstances where you ask PDS to disable an access token, as we essentially revoke our own access (rather than your ASPSP revoking access) a banking app may still appear to show oohMoolah as having access.

Where we store your personal data?

PDS processes and stores the personal data described in this Privacy Policy inside the UK. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and relevant data protection legislation at all times.

International transfers

PDS does not engage in restricted transfers of personal data; however, from time to time we may transfer your personal data to our other company offices based outside of the UK and European Economic Area (EEA) for the purposes described in this Privacy Notice. If we do this, your personal data will continue to be subject to one or more appropriate safeguards set out in the law.

How do you withdraw your consent?

Where processing of your personal data is based on your consent, you can withdraw your consent at any time. You can do this by sending an email to DPO@lendingmetrics.com, info@loohMoolah.com (when relating to access token) or via the contact information below. This will not affect the lawfulness of any processing undertaken prior to the withdrawal of your consent.

If you withdraw your consent, we may not be able to perform an account information search or transfer the account transaction data to your Credit Provider. We will advise you if this is the case at the time you withdraw your consent.

How long do we keep your personal data?

Where we hold your personal data and are responsible for it, the data will be stored in accordance with PDS' data retention practices and data protection legislation.

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, regulatory, tax, accounting or other requirements.

We generally store personal data for a period of 6 months from the date of the account information search. After this period, we will securely destroy your personal data. We may keep your data for longer than 6 months if we cannot delete it for legal or regulatory reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes. We do not retain personal data in an identifiable format for longer than is necessary.

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 we may use this information indefinitely without further notice to you.

Please note, your Credit Provider, as a separate and independent data controller, will have their own data retention practices.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We deploy a range of technical and organisational measures including physical, electronic and procedural safeguards to protect information we process and store.

We have put in place procedures to deal with any suspected or actual personal data breach and will notify you and any applicable regulator and/or supervisory authority of a breach where we are legally required to do so. PDS will comply with data protection legislation expectations and timelines (including a 72 hour investigation and reporting window) in order to mitigate the risk to any individuals affected.

Your Legal Rights

Under certain circumstances, you have rights under data protection legislation in relation to your personal data. In summary, these rights include:

- **Be Informed:** right to be informed over how we use your use personal data.
- **Access:** right to access to your personal data and to certain other supplementary information. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it (commonly known as a data subject access request).
- **Rectification:** right to request the 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.
- **Erasure:** right 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, 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.
- **Restrict processing:** right to request restriction or suppression of processing your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the personal data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Data Portability:** the right to move, copy or transfer 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.
- **Object:** right to object to the 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 and an absolute right to stop your data being used for direct marketing. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.

- **Automated decision making (including profiling):** right to object to decisions being taken by automated means including profiling which produce legal effects concerning you or similarly significantly affect you or to our continued processing of your personal data.
- **Withdraw consent:** right to withdraw your 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 wish to exercise any of the rights set out above, you can do this by sending an email to DPO@lendingmetrics.com or via the contact information below.

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 could refuse to comply with your request in these circumstances.

Data Subject Rights Requests

We try to respond to all legitimate requests within one month. Occasionally it could 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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the personal data (or to exercise any of your other rights). This may include your account or reference number, username, registration details or proof of your identity and address.

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.

Complaints

If you consider that your data has not been processed in accordance with this Privacy Notice or applicable data protection legislation, you have the right to make a complaint to the DPO by sending an email to DPO@lendingmetrics.com or via the contact information below.

Except in cases of exceptional circumstances, we will acknowledge receipt of your complaint within 5 Business Days of receipt of a complaint and will provide you with a substantive response within one month. If a complaint relates to the processing of personal data by PDS acting as a processor, we will communicate the details of the complaint to the controller without undue delay.

You also have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal data. Please visit the ICO's website for further details (<https://ico.org.uk/make-a-complaint/data-protection-complaints>). We would appreciate the chance to deal with your concern before you approach the ICO.

Cookie Statement

We may use cookies and temporary cache entries on our website. Cookies are small data files that websites send to your computer, tablet or other device when you visit them. These files remain on your device, enabling the website to recognise you on future visits and provide an improved user experience. Cookies store details

about your interactions with the website, such as your preferences, the type of device you used, your location at the time of connection and the pages you viewed.

Temporary cache entries are not the same as cookies. They are typically stored in your browser's cache and are not used to track user activity or identify you; they are simply stored as part of the website's normal operation to optimise loading times and performance. Cache entries are temporary and are cleared when your session ends, meaning no personal data is stored long term.

Types of cookies

Cookies may be set by us when you visit oohMoolah (first party cookies) or created by other sites, such as search engines or analytics services to track user behaviour across different sites (third party cookies). Cookies can be either session cookies or persistent cookies. Session cookies enable sites to recognise and link the actions of a user during a browsing session and expire at the end of each session. Persistent cookies enable sites to recognise a user, and these are stored on the user's system or device until they expire, although they can be deleted before the expiry date.

How we use cookies

Different types of cookies do different jobs on our website. PDS may use cookies for the following purposes:

Category	Purpose
Strictly necessary	<p>These cookies are needed to run our website, to keep it secure if you are logged on and to obey regulations that apply to us, including the UK GDPR and the Data Protection Act 2018, and other applicable laws that govern the use of cookies and online tracking, including the Privacy and Electronic Communications Regulations.</p> <p>These cookies also:</p> <ul style="list-style-type: none">• Help keep your information safe.• Help you move around the site.• Fulfil API calls and integration requests to connect to various accounts.• Tell us if you've been to the website before and which pages you went to.• Tell us how the website is working, so we can find and fix any problems.
Performance	<p>These cookies tell us how you use our website and help us understand traffic data relating to our website. We combine this data together and analyse it to help us improve the performance of our Service and the user experience.</p>
Functional	<p>These cookies are used to remember preferences and settings.</p>

General Website Visitor

Cookie Name	Purpose and retention
.AspNetCore.Antiforgery	<p>This cookie is a security cookie used to prevent Cross-Site Request Forgery (CSRF) attacks. It is a session-only cookie that expires when the session ends and does not track or store any personal data. Its main function is to ensure</p>

	that any request made to the server comes from a legitimate user, enhancing the website's security.
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Account Information Service User

Cookie Name	Purpose and retention
.AspNetCore.Antiforgery	This cookie is a strictly necessary security cookie used to prevent Cross-Site Request Forgery (CSRF) attacks. It is a session-only cookie that expires when the session ends and does not track or store any personal data. Its main function is to ensure that any request made to the server comes from a legitimate user, enhancing the website's and the Service's security.
.ASPNetCore.Session	This cookie is a strictly necessary functional cookie which temporarily stores session information such as preferences, authentication status and other temporary data during your visit to the website. It is a session-only cookie that enables the website to remember you across different pages of the website until you close your browser or after session timeout.

Please note that Google and Microsoft may also use cookies, over which we have no control. These third party cookies are likely to be analytical cookies or performance cookies.

How to manage cookies

You can manage cookie preferences in your browser Privacy and Security settings.

You can choose to delete existing cookies, allow or block all cookies, and set preferences for certain websites. If you disable or block all cookies (including essential cookies), some parts of this website may become inaccessible or not function properly. You can choose to delete cookies at any time; however, you may lose any information that enables you to use the website more efficiently.

For more information on the main cookies currently used, their purpose and their duration please contact the DPO by sending an email to DPO@lendingmetrics.com or via the contact information below.

Third Party Links

This website or the Service may include links to third-party websites. 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 practices.

The Service may link you to other websites including websites owned and operated by your ASPSP. Their websites may also gather information about you in accordance with their own separate privacy policies. For information on their data governance and privacy practices, please review their applicable terms of use and privacy notice.

Contact Details

For all enquiries or complaints regarding this Privacy Notice or complaints (including a request to exercise your legal rights), please contact the DPO by sending an email to DPO@lendingmetrics.com. Alternatively, our postal address is 1650 Parkway, Whiteley, Fareham, Hampshire PO15 7AH and our contact number is 02394 211010.

Changes to this Privacy Policy

We reserve the right to add to or change the terms of this Privacy Policy to keep up to date with evolving data protection legislation or to take account of changes to our Service. You are therefore advised to keep abreast of this Privacy Policy through whatever medium, site or device you access it.

Version

This version of the Privacy Policy was last updated on 11 February 2025.