

# Privacy Policy

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This information is provided in this policy, and it is important that you read that information together with any other privacy policy or fair processing notice that we may provide, so that you are fully aware of how and why we are using your personal data. This privacy policy supplements any other notices and is not intended to override them.

## Overview – key information you should be aware of

**Who we are:** We are Super Payments Ltd. If you need it, our company number is 13903817 and our registered office is 123 Buckingham Palace Road, London, SW1W 9SH. Super Payments Ltd is the controller of your personal data and is responsible for your personal data. All references in this policy to "Super", "our", "us" or "we" refer to Super Payments Ltd. All references in this policy to "our app" refer to the app owned by Super and made available to you in the Apple App store and Google Play Store. All references to "our website" refer to the website owned by Super at <http://superpayments.com> .

**Contact Details:** If you have any questions or concerns about this Privacy Policy, how we process your personal data, or if you wish to exercise any of your rights as a data subject, you can contact us at [dataprotection@superpayments.com](mailto:dataprotection@superpayments.com). Alternatively, you can write to us at Super Payments Ltd, 123 Buckingham Palace Rd, London, SW1W 9SH. Please be sure to mark all correspondence for the attention of our Data Protection Officer, so that we can get back to you quickly. If you have concerns about how we manage your personal data, you can make a complaint to the UK Data Protection Authority, the Information Commissioner's Office. You can find their contact details here: <https://ico.org.uk/global/contact-us/> .

**Our values and what this policy is for:** We value your privacy and want to be *accountable* and *fair* to you as well as *transparent* with you in the way that we collect and use your personal data. We also want you to know *your rights* in relation to your information which you can find [here](#).

In line with these values, this privacy policy tells you what to expect when we collect and use personal data about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please *contact us* using the details above.

If you have any concerns about our Privacy Policy or how we will process your personal data, then you should not access or use our App or Website. This App is not intended for children, and we do not knowingly collect data relating to children.

This policy is provided in a layered format so you can click through to the specific areas set out below.

- [IMPORTANT INFORMATION](#)
- [THE DATA WE COLLECT ABOUT YOU](#)
- [HOW IS YOUR PERSONAL DATA COLLECTED?](#)
- [HOW WE USE YOUR PERSONAL DATA](#)
- [DATA SECURITY](#)
- [DATA RETENTION](#)
- [YOUR LEGAL RIGHTS](#)
- [GLOSSARY](#)

## **IMPORTANT INFORMATION**

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review, and it may undergo changes. This version was last updated on 14<sup>th</sup> April 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 our relationship with you.

### **Third party links**

Our App, and Website from time to time, contains links to and from the websites of our partners, advertisers and affiliates. These include links to our payment partners (including 'Buy Now Pay Later' payment providers) and businesses using our platform. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We also have a social media presence for the purpose of engaging with you.

Please note that these websites and any services that may be accessible through them have their own privacy policies and we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

## **THE DATA WE COLLECT ABOUT YOU**

We may collect, use, store and transfer different kinds of personal data which we have grouped together as follows:

**Identity Data** which includes date of birth, first name and last name, ID verification documents and, if you are contacting us as representative of contact for a business, your job title. If you are making a travel booking or lodging reservation, names of fellow travellers or companions.

**Contact Data** which includes email address and telephone number. If you choose to use certain Super payment methods then this also includes your address details, shipping and billing address.

**Employment Data** which includes employment status.

**Financial Data** which includes, total annual income before deductions, monthly contributions towards mortgage or rent, card details for repayments, and identifier key that links your Super account to your bank account or payment card, and payment details, processed through our third-party payments and account providers.

**Transaction Data** which means details of Super transactions and business transactions including details of your items purchased, flight details (numbers, dates and times), and lists of fellow travellers or companions for flights, lodging reservations, and car rentals.

**Payments Data** means personal data which is processed by third party payment services providers on our behalf in order to process your payments, which includes your date of birth, your bank account information, your payment card information, balance amount, payment instruction and payment status information. Super does not have direct contact this data but is responsible for it as controller.

**Banking Data** which includes your bank account transaction history shared with Super if you opt to pay via Open Banking and consent to this sharing of data. If you opt to pay in this way, via Super direct debit, we will use third party account information service providers so that we can verify that you will have the funds available to discharge payment. We will store your bank account transaction history and balance in order to determine when best to retry payment requests.

**Payment Card Data** which only includes your card payment transaction history.

**Technical Data** which includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, IP address and details of your use of our App or Website including but not limited to browsing data and recordings of your movements around our App (see further below).

**Profile Data** which includes your username and password if you are a business using our business portal, Super transaction history, your interests, preferences, feedback and survey responses.

**Marketing and Communications Data** which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **Technical Data – further information**

Please note that we use a third party to record certain Technical Data which helps us to understand how our customers use our App so that we can optimise our services and deliver the best to you. The recordings are not intended to capture your personal data – i.e. they do not link to your account, and any identifiable personal data including your specific browsing and business website content is redacted. However, in some cases (such as where we have implemented an update to our systems), your personal data may inadvertently not be redacted at the time of recording. Where this occurs, we process your personal data in accordance with this privacy policy and take steps to anonymise the recording as soon as practicable.

## **HOW IS YOUR PERSONAL DATA COLLECTED?**

We will collect and process the following data about you:

### **Information you give us.**

This is information (including Identity, Contact, Employment, Financial, and Marketing and Communications Data) you give us about you by registering on our App or Website (together **Our Sites**) and using our services, or by corresponding with us (for example, by email or chat) or when you report a problem with our services, or any of Our Sites. If you contact us, we will keep a record of that correspondence.

## **Information we collect about you and your device.**

Each time you visit one of Our Sites we will automatically collect Technical Data. We collect this data using cookies and other similar technologies. Please see our [cookie policy](#) for further details.

## **Information we receive from other sources including third parties and publicly available sources.**

We will receive personal data about you from various third parties as set out below:

Technical Data from the following parties:

- SmartLook for usage recordings, based outside the UK.
- Seon for fraud detection, based outside the UK.
- Analytics providers such as Google based outside the UK.
- Advertising networks such as Facebook based outside the UK.
- Search information providers such as Google based outside the UK.

Identity, Employment, Financial, Transaction and Payments Data from providers of technical, payment and delivery services based inside the UK for the purpose of verifying your identity and processing transactions, and from businesses from whom you make a Super purchase.

Banking data from providers of account information services based inside the UK.

Payment card data from providers of card payment services based outside the UK.

## **Cookies**

We use cookies and/or other tracking technologies to distinguish you from other users of the App, App Site, the distribution platform (App store) or Services Sites and to remember your preferences. This helps us to provide you with a good experience when you use or browse our Sites and also allows us to improve Our Sites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our [cookie policy](#).

When making a purchase through Super you will be redirected to the business's website. Where it is necessary in order to link your purchase to your Super account and provide you with your cash reward, you will be prompted to accept the business's cookies. We encourage you to check the business's cookie policy directly for further information about the business's cookies.

## **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending you direct or third-party marketing communications by email or text. You have the right to withdraw that consent at any time by unsubscribing within the communication we send you or by contacting us via the contact details stated at the beginning of this policy.

### **Purposes for which we will use your personal data**

We have set out below, a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so depending on whether you are a consumer or business. We have also identified what our legitimate interests are where appropriate, and give information about disclosures of your personal data and international transfers.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

#### **If you are a consumer:**

<b>Purpose/activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To install the App and register you as a new App user	Identity Contact Technical	Performance of a contract with you

Purpose/activity	Type of data	Lawful basis for processing
<p>To process transactions made via our App or on the website of the business you have purchased from using our payment method. Also to deliver our services including managing your cash rewards.</p>	<p>Identity Contact Financial Transaction Payments Banking Payment Cards Technical Marketing and Communications</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to operate and improve our payment services, prevent fraud, keep records updated and analyse how customers use our products/services)</p>
<p>If you have selected a 'Buy Now Pay Later' payment option at checkout, to process your personal data to allow such third-party service providers to provide such services.</p>	<p>Identity Employment Contact Financial</p>	<p>Performance of a contract with you, or to take steps at your request prior to entering into a contract.</p>
<p>To manage our relationship with you including notifying you of changes to the App or any services</p>	<p>Identity Contact Financial Profile Marketing and Communications</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ services)</p> <p>Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions or our policies)</p>

Purpose/activity	Type of data	Lawful basis for processing
To enable you to participate in a prize draw, competition or complete a survey	Identity Contact Technical Profile Marketing and Communications	Your consent  Performance of a contract with you  Necessary for our legitimate interests (to analyse how customers use our products/services and to develop them and grow our business)
To administer and protect our business and App including fraud checking, troubleshooting, data analysis and system testing	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network and account security)
To deliver content and advertisements to you  To make recommendations to you about goods or services which may interest you  To measure and analyse the effectiveness of the advertising we serve you  To monitor trends so we can improve our App	Identity Contact Technical Profile Marketing and Communications	Consent  Necessary for our legitimate interests (to develop our products/Services and grow our business)

**Disclosures of your personal data**

We may have to share your personal data with the third parties set out below for the purposes set out in the table above:

- Service providers based in the UK, EU and US who provide payment and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue and Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses

or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

- Aggregated data with the business you have purchased from via our app or using our payment method directly on their website, such as spend by product categories. This data is not identifiable with you.

### **International transfers**

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

### **If you are a business:**

<b>Purpose / activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you or your business	Identity Contact	Performance of a contract with you
To process Super transactions and deliver services including managing payments and collecting money owed to us	Identity Contact Transaction Technical Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)

Purpose / activity	Type of data	Lawful basis for processing
To manage our relationship with you including notifying you of changes to our website or services	Identity Contact Profile Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to keep records updated and to analyse how businesses use our products/ services)  Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions or policies)
To administer and protect our business and this App including troubleshooting, data analysis and system testing	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To deliver content and advertisements to you  To make recommendations to you about goods or services which may interest you  To measure and analyse the effectiveness of the advertising we serve you  To monitor trends so we can improve the Website and our services	Identity Contact Technical Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products/Services and grow our business)

**Disclosures of your personal data**

We may have to share your personal data with the third parties set out below for the purposes set out in the table above:

- Service providers based in the UK, EU and US who provide CRM and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue and Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## **International transfers**

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **DATA SECURITY**

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted according to industry standards. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. Please contact us for further information.

We will collect and store personal data on your device using application data caches and browser web storage.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

## **DATA RETENTION**

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

In some circumstances you can ask us to delete your data. Contact the Data Protection officer via the contact details above. See your legal rights for further information [here](#).

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.

In the event that you do not use the App for a period of 6 years then we will treat the account as expired and your personal data will be deleted according to our data retention policy.

## YOUR LEGAL RIGHTS

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

Please click on the links below to find out more about these rights:

- [Request access](#) to your personal data.
- [Request correction](#) of your personal data.
- [Request erasure](#) of your personal data.
- [Object to processing](#) of your personal data.
- [Request restriction of processing](#) your personal data.
- [Request transfer](#) of your personal data.
- [Right to withdraw consent](#).

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us.

## GLOSSARY

### Lawful basis

**Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you

(both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## Your legal rights

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request 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.

**Request erasure** of your personal data. This enables you 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 (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with applicable 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.

**Object to 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy.
- where our use of the data is unlawful, but you do not want us to erase it.
- where you need us to hold the 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 data, but we need to verify whether we have overriding legitimate grounds to use it.

**Request transfer** of 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.

**Withdraw 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 withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.