



RUUT UK PRIVACY POLICY

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1. Who are we?

RUUT is a next-generation digital banking brand, developed by İş United Payment Systems Limited, which provides next-gen personal and business banking options to customers.

In partnership with Alibra FS UK Limited (the account provider for RUUT) and Enfuce UK Limited (the card issuer for RUUT), İş United Payment Systems provides customers in the UK with access to RUUT's web app and corresponding website: <https://ruutapp.com/en-GB> (together, the **RUUT App**) and its related money transfer services.

For further information about how Alibra FS UK Limited and Enfuce UK Limited process your personal data in connection with your use of the RUUT App, please see their respective privacy policies below:

- **Alibra FS UK Limited:** [<https://www.alibra.com/privacy-notice/>]
- **Enfuce UK Limited:** [<https://enfuce.com/privacy-and-data-protection/>]

In this privacy policy, references to the term “*Data Protection Laws*” means any data protection laws and regulations in the UK which apply to the processing of personal data, including any laws implementing them. References to the term “*RUUT*” refer to İş United Payment Systems Limited, of Kemp House, 124 City Road, London, United Kingdom, EC1V 2NX (**İş United**) and for the purposes of the Data Protection Laws, İş United is the relevant controller of your personal data where it is used in connection with your use of the RUUT App.

2. About this Privacy Policy

RUUT (**we, us, our**) takes your privacy and the security of your personal data very seriously. This privacy policy explains what personal data we may collect about you, how we may use it, the steps we take to keep it secure and explains your rights in respect of your personal data.

This privacy policy specifically applies to UK customers that use the RUUT App and should be read alongside our Terms of Conditions which explain in further detail how you are permitted to use the RUUT App. Please ensure that you read both documents carefully.

3. What personal data do we collect about you?

Under applicable Data Protection Laws, we are required to explain what personal data we collect from you, and how and why we use it.

We collect the following types of personal data directly from you:

- **Registration Data:** including your phone number and email address, as required to register for a user account on the RUUT App.

- **Account Data:** including your first name, surname, date of birth, place of birth (country and city), address, post code, language preferences, username and password, as required to set up your user account on the RUUT App.
- **Device Data:** including your IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, and other technologies on the devices you use to access the RUUT App. We may also collect certain personal data about you that we obtain via the use of cookies whenever you access and interact with the RUUT App or with emails/direct messages that we send to you. For further information on how we use cookies, please see section 12 below.
- **Location Data:** including information about your country of residence.
- **Usage Data:** including information such as how and when you use the RUUT App, performance statistics, traffic data, and other RUUT App usage data.
- **Communications Data:** including details of any correspondence or communications you send to us, any feedback that you provide us with and details of your contact and marketing preferences.
- **Third Party Data:** including personal data about you which we obtain from other parties such as our social media and media providers, public registers and any of our third-party service providers and partners.
- **Aggregated Data:** we may also collect, use and share aggregated data or anonymised data for statistics and/or analysis purposes. Aggregated data may be derived from your personal data but is not considered personal data as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature on the RUUT App.
- **Identity Data:** we will collect authorised copies or images of your ID documents, (including any results from our ID verification and screening checks) as well as any other necessary information for our required Know Your Customer (**KYC**) and/or Know Your Business (**KYB**) checks.
- **Financial Data:** including your credit score, information about your behavioural patterns and how you manage your account when using the RUUT App (including your account balance, payments into your account, the regularity of payments being made, credit limits and any arrears or default in making payments)

Please note, we only use your personal data to the extent necessary for the proper functioning and provision of our RUUT App and any related services and/or functionality, including our customer support services.

Special Categories of Personal Data

We may also process the following special categories of personal data for specific and limited purposes:

- **Health Data:** we may process certain information concerning your health where required to make our services accessible to you and/or to report complaints in line with our regulatory obligations.

- **Biometric Data:** we may process information, such as your fingerprint ID or facial recognition scan, for identification purposes including physical, physiological and behavioural identification. We use this where required to support your use of the RUUT App, to detect and prevent financial crime or where it is in the wider public interest (e.g., to protect your economic well-being).

We will only process these special categories of personal data where we've obtained your explicit consent or are otherwise lawfully permitted to do so (and then only for the particular purposes and activities for which the information is provided).]

4. How do we process personal data relating to minors?

If you are under the age of 16, you are not permitted to subscribe to or use the RUUT App and/or related services. We therefore do not knowingly collect personal data about children under the age of 16 for any purpose, and we will promptly delete such information if we are informed that we hold it.

5. How and when do we collect personal data about you?

We collect most of the personal data that we process about you directly from you when you:

- Register for a user account on the RUUT App
- Make or request any update to your user account on the RUUT App
- Contact us via the RUUT App, or in connection with your use of the RUUT App

We may also obtain personal data about you from various third parties that assist us with providing the RUUT App and/or related services to you, including:

- **Our marketing agents:** We may collect marketing information from marketing companies who send customer communications and direct marketing materials on our behalf.
- **Our data analytics providers:** We may collect data analytics information from companies that provide us with data analytics services.
- **Credit reference and fraud prevention agencies:** We may access and use information from credit reference and fraud prevention agencies (including information about your account, payment and credit history) when you first open your RUUT account and periodically, to check your identity and verify the accuracy of the information you provide; to manage and make decisions about your account (including assessing your creditworthiness); to prevent criminal activity, fraud and money laundering; and to trace and recover debts.
- **Our other third-party providers:** We may collect information from other third-party providers who provide support and services to us, including identity verification providers, social media providers, media providers, search engines and data analytics or advertising intermediaries who may collect data direct from their own cookies and websites.
- **Public registers and other publicly available information:** We may collect information from publicly available sources such as the UK electoral roll.

6. How do we use your personal data and why?

The specific personal data that we process about you and how we use it depends on how you use the RUUT App and any related services, so not all information in this section may be relevant to you, however we will only use your personal data where we are permitted to do so by law. Under applicable Data Protection Laws, we are required to always have a permitted reason (called a 'lawful basis') for using your personal data. The lawful bases that we rely on to use your personal data will generally be one or more of the following:

- **Contractual Necessity:** When it is necessary for us to use your personal data to enter into (and then fulfil our obligations under) a contract with you to provide you with the products and/or services that you have requested.
- **Legal Obligation:** When we must process your personal data to comply with our legal and/or regulatory obligations within the markets that we operate; for example, to detect and prevent fraud and/or criminal acts in connection with the use of the RUUT App.
- **Legitimate Interests:** Where it is necessary for our legitimate business interests in administering our relationship with you and running our business effectively. Where 'legitimate interests' is our legal basis for processing your data, we will take into account any potential impacts on your rights, freedoms, and interests.
- **Consent:** Where we have asked for and gained your consent to use your personal data (e.g., to send you marketing communications). In these cases, you can withdraw your consent at any time by either contacting us via the details included in the "How to contact us" section below, or via the contact form in the "Write Us" section of the RUUT App. Please note, the withdrawal of your consent will not affect the lawfulness of any processing we carry out before you withdraw your consent.

[As noted above, we will only process special categories of personal data where we have your Explicit Consent to do so. Where you have provided your consent for us to process your special category personal data, such as Biometric Data, you can change it at any time by either contacting us via the details included in the "How to contact us" section below, or via the contact form in the "Write Us" section of the RUUT App.]

7. What are our purposes for using your personal data?

There are many ways that we may need to use your personal data within the context of our relationship with you. We have set out the main purposes in the table below and have indicated the applicable lawful bases that we rely on for our processing. In some cases, more than one lawful basis may apply to our use of your personal data:

Purpose	Personal Data Processed	Lawful Basis
To communicate with you about a customer service query or complaint	<ul style="list-style-type: none">• Registration Data• Account Data• Location Data• Health Data (<i>where applicable</i>)	<ul style="list-style-type: none">• Contractual Necessity• Legal Obligation• Consent (including Explicit Consent, where applicable)

		<ul style="list-style-type: none"> • Legitimate Interests: <i>We use your personal data to respond to any query or other communications you submit to our customer service team</i>
To register and maintain your user account on the RUUT App	<ul style="list-style-type: none"> • Registration Data • Account Data • Location Data • Identity Data • Financial Data • Biometric Data (where applicable) 	<ul style="list-style-type: none"> • Contractual Necessity • Explicit Consent, where applicable
To provide, enhance and personalize your experience on the RUUT App	<ul style="list-style-type: none"> • Registration Data • Account Data • Usage Data • Device Data 	<ul style="list-style-type: none"> • Consent • Legitimate Interests: <i>We use your personal data to deliver a tailored experience when using our RUUT App</i>
To send you marketing communications	<ul style="list-style-type: none"> • Communications Data • Third Party Data 	<ul style="list-style-type: none"> • Consent • Legitimate Interests: <i>We use your personal data to provide you with information about our products or services which we think may be of interest to you</i>
To improve the performance of the RUUT App, including via the use of cookies	<ul style="list-style-type: none"> • Usage Data • Device Data • Aggregated Data 	<ul style="list-style-type: none"> • Consent • Legitimate Interests: <i>We use your personal data to help us deliver the best quality of service to you and our other customers via the RUUT App</i>
To measure, report on and improve the effectiveness of our marketing campaigns, including via the use of cookies	<ul style="list-style-type: none"> • Usage Data • Device Data • Aggregated Data • Communications Data • Third Party Data 	<ul style="list-style-type: none"> • Consent • Legitimate Interests: <i>We use your personal data to help us deliver the best quality service to you and our other customers</i>
To prevent or detect fraud or abuses of the RUUT App	<ul style="list-style-type: none"> • Account Data • Usage Data • Device Data 	<ul style="list-style-type: none"> • Legal Obligation

	<ul style="list-style-type: none"> • Identity Data • Financial Data • Biometric Data (where applicable) 	<ul style="list-style-type: none"> • Consent (including Explicit Consent, where applicable)
To carry out our KYC/KYB checks	<ul style="list-style-type: none"> • Registration Data • Account Data • Location Data • Identity Data • Financial Data 	<ul style="list-style-type: none"> • Legal Obligation • Consent • Legitimate Interests: <i>We use your personal data to prevent fraud, money laundering, and other financial crimes by ensuring that our customers are who they claim to be</i>

Please note that where we have indicated in the table above that our processing of your personal data is either:

- necessary for us to comply with a legal obligation; or
- necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

Credit Reference and Fraud Prevention Agencies

We may make certain decisions regarding your account registration based solely on automated checks of information from credit reference and fraud prevention agencies and our internal records. To help us make decisions on when to give you credit, we use a system called credit scoring to assess your application.

To work out your credit score, we look at:

- information you give us when you apply;
- information from credit reference agencies that will show us whether you've kept up to date with payments on any credit accounts or if you've had any court action such as judgments or bankruptcy; and
- your history with us such as maximum level of borrowing and existing debts.

You have rights in relation to automated decision-making, including a right to appeal if your application is refused. You can find further information about your rights in section 14 below.

8. Who do we share your personal data with and why?

We work with both national and international partners who support various business processes and may share your personal data with such partners. We may also share your personal data with certain of our external service providers that provide specific services and/or functionality in connection with the RUUT App.

Such third party service providers and business partners include:

- **Technical service providers:** Our service providers who are responsible for the secure and reliable operation of the RUUT App and for the storage and processing of your personal data and other information (e.g., hosting providers, payment service providers, providers of IT security solutions etc).
- **Other external business partners:** We may share your personal data with other of our third party business partners, such as auditors, banks, insurance companies, legal advisors and/or data protection supervisory authorities.
- **Public authorities or government agencies:** Where we are legally obliged to, we may share or disclose your personal data to certain public authorities or governmental agencies (including law enforcement agencies where criminal activity is suspected).
- **Social media platforms and advertising partners:** Where you consent to the use of cookies, we may share your personal data with our third party social media and advertising partners such as Google, Meta, X and Apple; [please see our separate Cookie Policy for further details][please see section 12 below for further information on our use of cookies.
- **Credit reference and fraud agencies:** We will continue to share information with credit reference agencies about how you manage your account including your account balance, payments into your account, the regularity of payments being made, credit limits and any arrears or default in making payments, while you have a relationship with us. This information will be made available to other organisations (including fraud prevention agencies and other financial institutions) so that they can take decisions about you, your associates and members of your household.

We require any third party service providers and/or business partners to process your personal data in accordance with applicable Data Protection Laws and the contractual arrangements we have in place with them.

9. How long do we retain your personal data for?

We only store your personal data for as long as is necessary to fulfil the respective purposes for which it was collected in the first place, or longer where we have a legal obligation or a legitimate interest to do so.

Similarly, where we share your personal data with third parties, we impose on those third parties' appropriate obligations around data deletion and data retention, in accordance with our own data retention practices, to ensure that your personal data is not kept for longer than required. Therefore, our third party service providers and business partners only store your personal data for as long as necessary to provide their respective services, or for longer, where permitted or required by law (e.g., in the event of existing or anticipated legal disputes).

10. Where do we store and/or transfer your personal data to?

Your personal data is stored exclusively on servers in the UK.

However, your personal data may be transferred to, and stored or processed in, one or more countries outside of the UK and/or European Economic Area (EEA), including countries which do not provide equivalent protection for personal data, such as the US. In these circumstances, we will take reasonable steps and implement appropriate measures to ensure that your personal data is adequately protected in accordance with applicable Data Protection Laws.

Such measures generally include either:

- transferring personal data to countries that have been deemed to provide an adequate level of protection for personal data under applicable Data Protection Laws; or
- transferring personal data where the recipient has agreed to an approved data transfer agreement in the form of the EU standard contractual clauses and the UK international data transfer addendum, or the UK international data transfer agreement.

Please contact us using the details below if you want any further information on (or to request a copy of) the specific safeguards which we use when transferring your personal data outside of the UK/EEA.

11. Direct Marketing

If you are an existing customer or you have consented to receiving marketing communications from us by phone, post or email or direct message, we may send you information on any offers or news about our products and/or services that we believe may be of interest to you. You may opt out of receiving this information at any time by clicking on the 'unsubscribe' link in any marketing communication we send you.

You can also ask us to stop sending you marketing messages by contacting us directly using the contact details set out in the "How to Contact Us" section above.

12. Cookies

The RUUT App uses cookies and similar technologies to optimise your user experience. Cookies are small text files that are stored on the memory of your mobile device and are assigned to the respective app instance. They enable the entity that places the cookie to recognise certain information and make it usable.

Cookies cannot execute programmes or transmit malware - they are technically harmless. Their main purpose is to make the use of the RUUT App easier, more efficient and more pleasant. Some cookies store settings or preferences that do not allow any conclusions to be drawn about your identity. Others may contain information that enables your device to be recognised - for example, to restore sessions or optimise loading times.

Types of cookies used in the RUUT App:

- **Session cookies:** These temporary cookies are automatically deleted as soon as you close the RUUT App.

- **Permanent cookies:** These remain stored beyond the current session on the RUUT App (e.g., to save your settings for future use).

Differentiation of cookies by function:

- **Strictly Necessary cookies:** These are essential for the basic operation of the RUUT App. They enable navigation, ensure stability and security and save important settings. They do not collect information for analysis or marketing purposes and are collected based on our legitimate interest.
- **Performance cookies:** These collect anonymised information about how the RUUT App is used (e.g., which functions are used particularly frequently or whether technical errors occur). This helps us to continuously improve your user experience.
- **Advertising & Targeting cookies:** These enable us to display personalised content or advertising within the App or from third-party providers - tailored to your interests. At the same time, they collect data to measure the success of this content. These cookies are stored for a maximum of 13 months and are only used with your consent.
- **Third Party cookies:** These improve interaction with other platforms, e.g., social networks, and enable content to be shared. They are also stored for a maximum of 13 months and are only set with your consent. The personal data we collect about you via cookies will only be passed on to third parties if you give us your consent to do so.

In accordance with applicable Data Protection Laws, the use of any cookies that are not classified as strictly necessary is only permitted where you have provided your consent. This applies in particular to Advertising & Targeting cookies and Third Party cookies, and we have set out below further details of the Advertising & Targeting and Third Party cookies that we use in the RUUT App:

12.1. Meta Pixels

In the RUUT App, we use the analytics and tracking tool Meta Pixel, which is provided by Meta Platforms Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. This tool helps us to better understand the impact of our advertising campaigns on platforms such as Facebook and Instagram and to improve them in a targeted manner. By integrating the meta pixel, we can track which actions users perform within the RUUT App, such as whether certain content has been viewed or certain functions have been used, and on this basis, we can display our advertising content in a more targeted manner. It also enables us to retarget RUUT App users who have already shown an interest in certain offers with relevant advertising. During use of the RUUT App, various technical information is processed by Meta, including the content accessed, interactions with certain elements, technical data such as your IP address, the device used, operating system, screen resolution and - if you have reached us via an advert - also an anonymous advertising click identifier.

In addition, a randomly generated user ID is used to track sessions in pseudonymised form. Personal contact information such as your name, email address or telephone number is not transmitted to Meta. The data collected via the Meta Pixel may also be processed on Meta's servers outside the European Union, in particular in the United States. Meta may also store a recognition feature in your browser or in the RUUT App, which remains stored for up to one year and allows you to be recognised at a later date. If you are logged in to Facebook or Instagram at the same time as using the RUUT App, it is possible that Meta will assign the RUUT App activities recorded to your user account there. If you do not want this data to be collected, you can deactivate tracking at any time

by either adjusting the app-specific data protection settings of your end device, for example via the app tracking transparency under iOS or corresponding Android settings, or by rejecting the use of marketing technologies in our consent dialogue. As soon as tracking is deactivated, the Meta Pixel is not activated, and no data is transferred to Meta.

Further information about the Meta Pixel can be found in the Meta privacy policy here:

Meta Privacy Policy : <https://www.meta.com/legal/privacy-policy/>

12.2. Google Ads

We use the Google Ads service in our RUUT App to provide you with relevant and personalised advertisements. This service is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ads allows us to display ads within the Google search engine and on partner websites and other Google services that are tailored to your interests and user behaviour. In order to measure and optimise the effectiveness of our advertising campaigns, we collect certain information, such as your interactions with the ads.

Google may use cookies or similar technologies to process data such as your IP address, device information and usage data. The processing of your data in connection with Google Ads takes place exclusively on the basis of your consent in accordance with Data Protection Laws. You have the option to withdraw your consent at any time with effect for the future in the RUUT App's privacy settings.

Further information about the data processing by Google in the context of Google Ads can be found in the Google privacy policy here:

Google Privacy Policy: <https://policies.google.com/technologies/>

12.3. Apple Search Ads

We also use Apple Search Ads in the App; an advertising platform from Apple Inc, Infinite Loop, Cupertino, CA 95014, USA. With the help of this service, we can place targeted adverts in the Apple App Store that are displayed to users based on search terms or other criteria. This helps us to make our RUUT App more visible and to target users more effectively. Apple processes information such as device type, iOS version, location (if activated), search queries and Apple App Store activity. The processing of your data in connection with Apple Search Ads takes place exclusively on the basis of your consent in accordance with Data Protection Laws. You can revoke your consent at any time with effect for the future in the privacy settings of the RUUT App.

Further information can be found in the Apple Search Ads privacy policy here:

Apple Search Ads Privacy Policy: <https://ads.apple.com/app-store/privacy>

X Ads Manager

The RUUT App uses the X Ads Manager (formerly Twitter Ads Manager) to run targeted advertising campaigns on the X platform (formerly Twitter). Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland processes personal data in order to measure and improve the effectiveness of advertising. The processed data includes device information such as IP address, browser type, operating system, location data (if activated),

interactions with adverts (e.g., clicks, video views). This data helps to optimise the display of advertising and improve targeting.

Your data is processed exclusively on the basis of your consent in accordance with Data Protection Laws. You have the option to revoke your consent at any time with effect for the future in the RUUT App's privacy settings.

Further information can be found in the X Ads Manager privacy policy here:

X Ads Manager Privacy Policy: <https://privacy.x.com/en>

Google Tag Manager

In the RUUT App, we use the Google Tag Manager, a tool from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Tag Manager enables us to manage website tags via a user interface without storing personal data or setting cookies. It is used exclusively to trigger other tags, which in turn may collect data. The Google Tag Manager does not access this data.

If deactivation has been carried out at domain or cookie level, this remains in place for all tracking tags that are implemented with Google Tag Manager. The use of Google Tag Manager is based on our legitimate interest in accordance with Data Protection Laws to increase the efficiency of the RUUT App and to simplify the management of tags. However, it should be noted that technical information such as IP address and browser data may be transmitted to Google when the Google Tag Manager is loaded. Google Tag Manager itself does not store any personal data.

Further information about the data processing by Google in the context of the Google Tag Manager can be found in the Google privacy policy here: <https://policies.google.com/privacy>

12.4. Firebase Analytics

In the RUUT App, we use the analytics service Firebase Analytics, a service provided by Google Ireland Limited for users in the European Economic Area and Google LLC based in the USA. This service helps us to better understand the behaviour within the RUUT App in order to continuously improve functions and user-friendliness. Firebase Analytics only collects pseudonymised information. This includes, for example, device and app-related information such as the operating system, the installed app version, usage information such as the frequency or duration of certain views and a shortened IP address that does not allow any conclusions to be drawn about your identity. A randomly generated app instance ID is used to recognise you. Personal data such as your name, address or sensitive information from your banking profile is neither transmitted to Google nor processed by RUUT. The basis for the processing of your data is either your consent or our legitimate interest in the qualitative and technical optimisation of the RUUT App in accordance Data Protection Laws. If it is necessary to transfer data to servers outside the European Union, in particular to the United States, this will only be done in compliance with the statutory safeguards, such as the use of EU standard contractual clauses. Firebase Analytics is used by Google exclusively on behalf of RUUT. To the best of our current knowledge, Google does not process this data for its own purposes. The data is only stored for as long as is necessary for analysis purposes and is then either deleted or completely anonymised. If you do not want Firebase to analyse your usage behaviour, you can deactivate tracking at any time in the privacy settings of the RUUT App. Alternatively, you can also use system-wide data protection or advertising settings on your mobile device. If you have previously given us your consent, this can also be revoked at any time via the RUUT App settings in the "Privacy" section

- with effect for the future, of course. Deactivating the analysis has no influence on the use of the core functions of the RUUT App.

Further information about the data processing by Firebase and the protection mechanisms used can be found in Firebase's official privacy policy here: <https://firebase.google.com/support/privacy>

12.5. Adjust GmbH

In the RUUT App, we use the Adjust service from Adjust GmbH, Saarbrücker Str. 37a, 10405 Berlin, Germany, to analyse the effectiveness of our marketing campaigns and to better understand the use of the RUUT App. Adjust processes pseudonymised data such as hashed IP addresses, device identifiers, app usage data such as app starts, session duration and interactions as well as installation and event data. This information helps us to improve the performance of the RUUT App and optimise our marketing measures. The processing is based on our legitimate interest in accordance with Data Protection Laws. Adjust ensures an appropriate level of data protection through suitable guarantees.

Further information can be found in Adjust's privacy policy here: <https://www.adjust.com/terms/privacy-policy>

13. Links to Third Party Websites

The RUUT App may contain links to third party websites and other digital platforms that are provided for your convenience.

We are only responsible for the privacy practices and security of the RUUT App. We therefore recommend that you check the privacy and security policies and procedures of any other website and/or digital platform that you access via any of the links embedded within the RUUT App prior to using them.

14. What are your rights in respect of the processing of your personal data?

As a user of the RUUT App, you have various rights with regard to our handling of your personal data which are summarised below:

- **Right to Access:** You have the right to ask us for copies of to your personal data. This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Right to Rectification:** You have the right to ask us to rectify the personal data that we hold about you.
- **Right to Request Erasure:** You have the right to ask us to erase your personal data in certain circumstances.
- **Right to Object:** You have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party). You also have the right to object your personal data being processed for direct marketing purposes.
- **Right to Restriction of Processing:** You have the right to ask us to restrict the processing of your personal data in certain circumstances.

- **Right to Portability:** You have the right to ask that we transfer the personal data you gave us to another party, or to you, in certain circumstances.
- **Right to Withdraw Consent:** As noted above, where we are relying on consent to process your personal data, you are able to withdraw your consent at any time. To withdraw your consent, please contact us using the details provided in Section 16 "*How to contact us*" of this privacy policy. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so. Also, the withdrawal of your consent will not affect the lawfulness of any processing carried out by us before you withdraw your consent.
- **Right to not be Subject to a Decision Based on Automated Processing:** You have the right to request that certain decisions are made with human intervention.

Further information about your rights in respect of your personal data as a UK customer can be found here: <https://ico.org.uk/>

If you require any further information or if you would like to exercise any of your rights, please contact us using the contact details below. Please note, to protect the confidentiality of your personal data, we may need you to provide further information so that we can verify your identity before we can respond to your request.

15. Where to make a complaint

Whilst we would appreciate the opportunity to deal with any query, concern or complaint you may have in the first instance, if you are unhappy with how we have used your personal data, you also have the right to lodge a complaint at any time with a data protection supervisory authority, which is the Information Commissioner's Office (ICO) in the UK:

- **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.
- **Website:** <https://ico.org.uk/>
- **Helpline number:** (+44) 0303 123 1113

16. How to contact us

If you have any questions or concerns about this privacy policy or how we process your personal data, please contact us email our data protection officer at dpo@ruutapp.com or use the contact form integrated within the "Write Us" section of the RUUT App.

17. Updates to this privacy policy

From time to time, we may make updates to this privacy policy, and the most current version can be viewed at any time in the RUUT App.