



## Privacy Policy

*Updated: 5th May 2026*

**Who we are** – Odola Ltd is a UK-based financial services company empowering customers with better financial services via our mobile app.

**Why we collect data** – To open your account, keep it safe, meet the law and, if you agree, tell you about new Odola features.

Key facts:

- We never sell your data.
- We keep your information in the UK or apply strict safeguards if it ever leaves.
- You're in control - you can see, download, correct or ask us to delete data we no longer need to keep.

Need help? Email [privacy@odola.com](mailto:privacy@odola.com)

For the purposes of these laws, Odola Ltd (Company No. 16180580) with registered office at 9th Floor, 107 Cheapside, London, EC2V 6DN, is the data controller of the personal data described in this Policy. This Privacy Policy has been prepared in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations (PECR), and changes made by the Data (Use and Access) Act 2025. We are committed to protecting your privacy and handling your personal information in a fair, transparent, and secure manner.

### 1. Who this notice covers

This notice applies to anyone who uses the Odola app and our marketing website. It explains what personal data we collect, how we use it, who we share it with, and the choices and rights available to you. It is not a contract, and it does not mean we rely on consent for everything we do. We only rely on consent where we clearly ask for it. If anything is unclear, please contact the Odola Support team for guidance.

#### 1.1. Who can use Odola?

Odola is not for people under 18. We do not knowingly collect children's data and will delete it if we discover it. Parents can contact us at the address above to remove a child's data.

### 2. The data we collect

| Category | Examples | Why we need it |
|----------|----------|----------------|
|----------|----------|----------------|

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identification                              | Name, date of birth, ID document and a selfie or video                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | To verify your identity                                                                                                                                                                                                                                                                                                              |
| Contact                                     | Email, phone, address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Send statements and security alerts                                                                                                                                                                                                                                                                                                  |
| Account                                     | Sort code, account number, debit-card PAN, balance, transactions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Provide and protect your account                                                                                                                                                                                                                                                                                                     |
| Usage                                       | Log-ins, device and IP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Improve app and spot fraud                                                                                                                                                                                                                                                                                                           |
| Marketing & analytics                       | Device identifiers (for example, advertising IDs, app instance IDs and other analytics identifiers), install source, and in-app events (such as app opens, registration completion and certain feature usage), together with approximate location derived from IP address, cookie identifiers and similar online identifiers on our website, referral URLs, campaign IDs, ad-click information, hashed contact details where we use matching services, and information about whether you opened, clicked or interacted with our marketing communications. | To understand how people find and use Odola; attribute app installs, registrations and other conversions to our campaigns; build and measure audiences; suppress people who have opted out of marketing; personalise the timing, frequency and content of our marketing where permitted; and help detect fraud or misuse of the app. |
| Communications                              | Chats, emails, call recordings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Customer support and training                                                                                                                                                                                                                                                                                                        |
| Support needs and vulnerability information | Accessibility requirements, communication preferences, information about a representative or trusted contact, and limited information about health, disability or other circumstances you choose to share                                                                                                                                                                                                                                                                                                                                                 | So we can support you appropriately and make reasonable adjustments                                                                                                                                                                                                                                                                  |
| Third-party checks                          | Sanctions flags, PEP screening, fraud-prevention and credit-reference results                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Meet AML, KYC and fraud-prevention rules                                                                                                                                                                                                                                                                                             |

For identity verification, we may process a selfie or video, liveness-check information and details extracted from them to confirm that you are the person shown on your identity document and to help prevent fraud. If this involves facial matching or a biometric template used to identify you, we use it only for identity, fraud-prevention and account-safety purposes.

If you choose to tell us about a health condition, disability, accessibility need, representative, trusted contact or other support need, we use it only to provide appropriate support, make reasonable adjustments, protect you from harm or fraud, or meet legal or regulatory duties. We do not use support-needs or other special-category data for marketing or unfair eligibility decisions, and access is limited to people who need it.

Where the law treats data as special-category data, including biometric data used to identify you, we rely on an Article 9 UK GDPR condition, such as explicit consent where we ask for it or substantial public interest conditions under the Data Protection Act 2018 for preventing fraud, preventing or detecting unlawful acts, safeguarding customers at risk and meeting regulatory requirements. Where we process criminal-offence data or suspected unlawful activity for fraud, AML, sanctions or PEP checks, we do so under Article 10 UK

GDPR and the relevant Data Protection Act 2018 conditions. We keep appropriate safeguards and policy documents where the law requires this.

Some information is needed to open and run your account, meet legal checks and keep the service secure. If you do not provide it, we may be unable to open or continue your account or provide some features.

**How we collect data** - we collect data directly from you when you apply, use the app, contact us or change your settings. We also collect some data automatically from your device, app and website use. We may receive data from identity-verification providers, fraud-prevention agencies, credit-reference agencies, sanctions and PEP databases, app stores, referral partners, advertising and analytics partners, Odola group companies and public sources.

### 3. How we use your data (and the legal bases)

**Running your account** - we use your personal data because it is needed to open, operate and service your Odola products, provide customer support, communicate with you about your account and meet related contract, legal and regulatory duties.

**Safety and compliance** - we use data to verify identity, run KYC, sanctions and PEP screening, prevent and detect fraud and financial crime, monitor AML risks and protect the financial system. Depending on the activity, we rely on legal obligation, recognised legitimate interests or legitimate interests for crime and fraud prevention, and substantial public interest conditions where special-category or criminal-offence data is involved.

**Fraud and financial-crime consequences** - where we suspect fraud, money laundering, sanctions risk, identity misuse or other unlawful activity, we may delay, refuse or cancel a transaction, restrict account access, close an account, or report information where the law requires or allows us to.

**Improve Odola** - where usage data can identify you, we rely on legitimate interests to fix bugs, improve reliability and build features that make Odola work better. We also use anonymised or aggregated data that no longer identifies you.

**Attribution and analytics** - we use analytics to understand how people discover and use Odola, measure campaigns and prevent fraud or abuse. We rely on legitimate interests for limited measurement that does not need storage or access consent, and on your consent where PECR requires consent for non-essential cookies, SDKs, device identifiers or app-tracking technologies.

**Talk to you** - we send statements, updates, service messages, security warnings and regulatory notices where needed for our contract with you, to meet legal or regulatory duties or for our legitimate interests in keeping you informed and secure.

**Marketing** - We may contact you with marketing messages about Odola features and services. We keep marketing choices separate by channel, and you can change them at any time:

- New customers (consent basis): we only send marketing emails, SMS or marketing push notifications where you have given us consent or enabled that channel in your app or device settings.
- Existing customers (PECR soft opt-in for email and SMS): we may send email or SMS marketing about Odola's own similar products or services where we collected your contact details directly from you during a sale or negotiation for Odola services, and gave you a clear opt-out when we collected them and in every later message.
- Targeted online advertising (legitimate interest / consent): we may display adverts about Odola on third-party platforms and social media channels by sharing hashed identifiers or audience signals. We ask

for consent where required, including where non-essential cookies, SDKs, device identifiers or app-tracking technologies are used.

**Direct marketing** - we may send marketing by email, SMS, push notification, in-app message, social media or similar channels where permitted by law. For email and SMS, we rely on consent unless the PECR soft opt-in applies. For push notifications and in-app messages, we rely on your device or in-app permissions where relevant and the legal basis explained when the channel is enabled. We may also use limited customer or prospect data, such as hashed email addresses or other identifiers, to create or suppress audiences on advertising platforms, avoid advertising to people who have opted out, and measure reach and conversion. We ask for consent before placing or reading non-essential cookies or using app-tracking technologies where required.

**Marketing profiling** – where permitted, we may use information such as your product holding, whether your registration is complete, broad engagement patterns, device or channel information, approximate location and previous interactions with our website, app or messages to decide which campaigns, content or offers are more likely to be relevant to you, and when to suppress messages that are unlikely to be useful. We do not use special-category data for this purpose, and we do not make solely automated decisions that produce legal or similarly significant effects on you for marketing purposes.

**Marketing preferences and suppression** – we keep a record of your consent status, channel preferences, cookie choices, app-tracking permissions and unsubscribe requests so that we can respect them, avoid sending unwanted marketing and demonstrate compliance with applicable law.

How to opt out of marketing: you can withdraw consent or opt out of marketing at any time by (a) clicking “unsubscribe” in any email we send you, (b) adjusting your notification preferences in the Odola app under Settings > Notifications, or (c) emailing [privacy@odola.com](mailto:privacy@odola.com). Opting out will not affect service-related communications such as statements, security alerts, or regulatory notice.

Automated tools (including AI) help us with identity checks, fraud and AML flags, sanctions and PEP alerts, suspicious activity monitoring, account security and customer-support routing. We do not make solely automated decisions that have a legal or similarly significant effect on you. A trained specialist reviews any decision that could significantly affect you, such as refusing onboarding or restricting your account. You can ask for human review or challenge a decision.

## 4. Sharing your data

We never sell your information. We only share it with:

- Trusted service providers who host our platform, provide IT and security support, analytics, attribution, CRM, marketing automation, advertising, audience-matching, survey and campaign-measurement services, deliver SMS, email, push or in-app notifications, print cards, or run identity and sanctions checks. These providers act on our instructions under contracts that require them to keep your data safe and prohibit them from using your data for their own independent purposes except where they act as a separate controller and this is clearly explained to you.
- Regulators, courts or law-enforcement when the law says we must.
- Fraud-prevention and credit-reference agencies to confirm identity and protect the financial system.
- Other Odola group companies on a need-to-know basis.

These partners may include cloud-hosting providers, CRM and customer-engagement tools, analytics and attribution SDKs, website analytics and consent-management providers, social media and digital advertising platforms, messaging providers, survey providers and fraud-prevention tools. Where we use advertising or audience-matching partners, we may share identifiers such as cookie IDs, mobile advertising IDs, hashed email addresses, campaign IDs, IP address or conversion events so that we can measure campaign effectiveness, limit ad duplication, build or suppress audiences, and understand whether someone who saw or clicked an advertisement later used Odola.

Where a social media or advertising platform acts as an independent controller for its own processing, its own privacy notice will also apply to the data it receives.

#### 4.1. International transfers

Most data sits on servers in the UK. Some suppliers are in the EEA or other countries. When we transfer data abroad we rely on an adequacy decision, the UK Addendum to the EU Standard Contractual Clauses, the UK IDTA or binding corporate rules adopted by our supplier. We keep a list of international transfers and safeguards - ask us if you would like a copy or summary.

## 5. How long we keep your data

| Record type                                | How long we keep it                         | Statutory / business reason     |
|--------------------------------------------|---------------------------------------------|---------------------------------|
| Customer profile and ID documents          | 5 years after account closure               | UK Money-Laundering Regulations |
| Transaction records                        | 7 years                                     | Taxes, audits, AML              |
| Customer-service chats and call recordings | 6 years                                     | Quality, dispute resolution     |
| Marketing preferences (opt-out list)       | Indefinite                                  | Honour your choice              |
| Device and usage logs                      | 2 years                                     | Security and troubleshooting    |
| Anonymised or aggregated data              | No personal data – can be kept indefinitely | Analytics                       |

We delete or irreversibly anonymise your data once these periods expire. You can ask for more detail at any time.

## 6. Cookies and similar tech

**Mobile app** - The Odola app uses software development kits (SDKs) and similar technologies for security, service delivery, analytics and marketing-measurement. We use strictly necessary SDKs and similar technologies without consent only where needed to provide the service you asked for, keep the app secure or prevent fraud. We ask for consent before using non-essential SDKs, advertising IDs, app-tracking

technologies or marketing-measurement tools where PECR requires it. You can change choices in the app or device privacy settings.

**Website** - The Odola website uses essential cookies to make the site work. We ask for your consent before using optional analytics, advertising, pixels or similar technologies. For full details see our Cookie Policy and the banner shown on your first visit.

## 7. Your rights

You can:

- **Access** – get a copy of the data we hold.
- **Correct** – fix inaccurate information.
- **Delete** – ask us to erase data we no longer need.
- **Restrict** – pause certain processing.
- **Object** – especially to direct marketing, including profiling relating to direct marketing.
- **Port** – move data you gave us to another provider.
- **Challenge automated decisions** – request human review.
- **Withdraw consent** – at any time, where consent is the basis.

We usually reply to rights requests within one month, unless the law allows more time. To exercise a right, email [privacy@odola.com](mailto:privacy@odola.com).

**Checking requests** - to protect your information, we may ask you to confirm your identity before we deal with a rights request. If someone acts for you, we may ask for evidence of their authority. We may refuse or charge a reasonable fee for requests that are manifestly unfounded or excessive, where the law allows.

## 8. Keeping your data safe

We use encryption at rest and in transit, multi-factor log-ins, strict access controls, 24/7 monitoring and regular penetration tests. You can help by keeping your device secure and never sharing your PIN.

## 9. Complaints

We hope we can resolve any concern. You can raise a data protection complaint by emailing [privacy@odola.com](mailto:privacy@odola.com) or contacting us through in-app support. We will acknowledge your complaint within 30 days, look into it without undue delay, keep you updated where appropriate and tell you the outcome. You can also complain to the Information Commissioner's Office at [ico.org.uk](http://ico.org.uk) or on 0303 123 1113. If you live in the EEA you may complain to your local authority.

## 10. Changes to this notice

We'll post any changes in-app and on our website. If the update is significant, we'll email or notify you. The date at the top tells you when we last changed the notice.

Thank you for choosing Odola.