

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and what to do if you have a complaint.

This privacy policy does not apply to any third party websites that may have links to our own website.

## 1 Who are we and what do we do?

Union Income Ltd is a provider of the prepaid card Our contact details can be found at section 17.

We collect, use and are responsible for certain personal data about you. When we do so we must comply with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA18) and Data Use and Access Act (DUAA) 2025 If you are in the European Union we must also comply with the EU General Data Protection Regulation (EU GDPR) in relation to the services we offer to such individuals.

## 2 Terminology

It would be helpful to start by explaining some key terms used in this policy:

**We, us, our** – We are Union Income Ltd (UI). Our registered office is 14th Floor 33 Cavendish Square, London, W1G 0PW and our company registration number is 06595562. We are registered with the Information Commissioner's Office and our registration number is Z1929787.

We are part of the Embignell Group, a full list of the group companies and our trading names can be found here:

[Embignell Group Companies and Trading Names](#)

**Personal data** - Any information relating to an identified or identifiable individual

**Special category personal data** - Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic data, biometric data (where used for identification purposes) and data concerning health, sex life or sexual orientation

**Data subject** - The individual who the personal data relates to

## 3 Personal data we collect about you

We collect or use the following information:

- Registration information and contact details including name, mobile number, email address, address, phone number, date of birth and bank details, If partner is added these details are also collected for your partner.
- Customer account information including account status, security data, location or address, settings, marketing preferences, purchase status and cashback status, membership number.
- Other personal information including location, address, and additional information we may occasionally ask from you, or you provide voluntarily.

- Partner services information, information provided by a partner provider relating to a service or product you clicked, applied for a Prepaid card, directly from our partner's website.
- Information related to products or services you have within the Embignell group.
- Usage and interaction information including device details and tracking data (apps and websites) and information about how you interact with and use our apps and websites, products and services.
- Enquiries and correspondence (in-app messages, website contact forms, emails, phone calls or other communication channels) - including details of communications, dates, contact details and responses and audio recordings of calls.
- Enquiries or communications via our social media pages.
- Feedback and surveys on the use of our products and services.
- Unique customer identifier number which relates to you as an individual in our system.
- Mandatory information we must store, monitor or share, for example, financial services complaints and suspicious activity.
- Trade union membership if you have come to us through a trade union your trade union membership details.
- Identity checks including information to enable us to check and verify your identity.

If you do not provide personal data we ask for, it may prevent you from using some or all of our services.

#### **4 How your personal data is collected**

We collect most of the above information from you. However, we may also collect information directly from a third party, for example:

- those who provide us with your details where you have expressed an interest in hearing about our products
- your trade union
- the electoral role or other identity provider
- other companies within the Embignell Group
- via our website, we use cookies and similar technologies on our website (for more information on cookies, please see our [Cookie Policy](#)); and
- via our security, information technology (IT) systems.

#### **5 How and why we use personal data**

Under data protection law, we can only use your personal data if we have a proper reason, for example:

- you have given consent—where we need your consent, we will ask for it separately of this privacy policy and you can withdraw consent at any time;
- to comply with our legal and regulatory obligations;
- to fulfil any contractual obligations with you or take steps at your request before entering into such a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You have the right to object to processing based on legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms or the processing is required to establish, exercise or defend legal claims.

We use your personal data for the following reasons:

- For the provision of cashback, Depending on the circumstance we may use your personal data to fulfil our contractual obligations with you or to take steps at your request before entering into such a contract. We may also use your personal data for our legitimate interests such as making sure we can keep track of transactions.
- To administer any prize draw we regularly offer. Entries may be automatic or require you to complete an action and involve using your personal data to fulfil this function. For example, if you take out a prepaid card . You can opt out of the prize draws by contacting us. Depending on the circumstances we may use your personal data to comply with our legal and regulatory obligations, to fulfil our contract with you or to take steps at your request before entering into a contract or for our legitimate interests such as to ensure the prize draws are fair and transparent.
- UI may use API calls, or similar means of usage tracking and the demographic or personality linked data we have collected, and with third-party analysis partners to understand usage patterns of users anonymously and to serve advertisements to you that are tailored based on our analysis of what we believe you would like in light of the information that we have collected or accessed about you as described in this policy. Depending on the circumstances we may use your personal data with your consent or for our legitimate interests to be as efficient as we can so we can deliver the best service to you at the best price.
- For the prevention and detecting fraud against you or us. We may use your personal data for our and/or your legitimate interests such as to minimise fraud that could be damaging for you and/or us.
- For conducting checks to identify and verify customers and other activities necessary to comply with professional, legal and regulatory obligations that apply to our business. Depending on the circumstances we may use your personal data to comply with our legal and regulatory obligations or for our legitimate interests such as to protect our business, interests and rights.

- To enforce legal rights or defend or take legal proceedings. Depending on the circumstances we may use your personal data to comply with our legal and regulatory obligations or for our legitimate interests such as to protect our business, interests and rights.
- For gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies. Depending on the circumstances we may use your personal data to comply with our legal and regulatory obligations or for our legitimate interests.
- To ensure internal business policies are complied with such as policies covering security and internet use. We may use your personal data for our legitimate interests such as to make sure we are following our own internal procedures so we can deliver the best service to you.
- Operational reasons, such as improving efficiency, training and quality control. We may use your personal data for our legitimate interests such as to be as efficient as we can so we can deliver the best service to you at the best price.
- To ensure the confidentiality of commercially sensitive information. Depending on the circumstances we may use your personal data for our legitimate interests such as to protect trade secrets and other commercially valuable information or to comply with our legal and regulatory obligations.
- For the protection of the security of systems and data used to provide services, preventing unauthorised access and changes to our systems. Depending on the circumstances we may use your personal data for our legitimate interests, such as to prevent and detect criminal activity that could be damaging for you and/or us or to comply with our legal and regulatory obligations.
- For updating and enhancing customer records. Depending on the circumstances we may use your personal data to fulfil our contract with you or to take steps at your request before entering into a contract, to comply with our legal and regulatory obligations or for our legitimate interests such as making sure we can keep in touch with our customers about existing and new services.
- To deal with complaints. Depending on the circumstances we may use your personal data to comply with our legal and regulatory obligations or for our or your legitimate interests to ensure complaints are dealt with properly.
- For external audits and quality checks. Depending on the circumstances we may use your personal data for our legitimate interests such as to achieve and maintain relevant accreditations so we can demonstrate we operate at the highest standards or to comply with our legal and regulatory obligations.
- To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary. Depending on the circumstances we may use your personal data to comply with our legal and regulatory obligations or in other cases, for our legitimate interests such as to protect, realise or grow the value in our business and assets.

Where we process special category personal data (see section 2 '**Terminology**'), we will also ensure we are permitted to do so under data protection laws, for example:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent;
- the processing is necessary to establish, exercise or defend legal claims; or
- the processing is necessary for reasons of substantial public interest.

## 6 Marketing

We may use your personal data to send you updates (such as by email, text message, telephone, in app-messaging, post or social media channels) about our services and the services of others including others within the Embignell group, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see section 5 '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information about our products. Where this is not the case, we will always ask for your consent.

In all cases, you have the right to opt out of receiving marketing communications at any time by:

- contacting us at [dataprotection@embignell.com](mailto:dataprotection@embignell.com);
- using the 'unsubscribe' link in emails or 'STOP' number in texts;
- adjusting your phone settings to stop receiving push notifications.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

## 7 Who we share your personal data with

We routinely share personal data with:

- companies within the Embignell Group (see section 2 '**Terminology**');
- Pluxee UK Limited
- your trade union
- third parties we use to help administer our services to you, such as providers of our case management and finance system, IT service providers including communication providers, cloud service providers such as data storage platforms, shared service centres and financial institutions in connection with invoicing and payments;

- other third parties we use to help promote our business, such as marketing agencies;
- our banks;

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We ensure all outsourcing providers operate under service agreements that are consistent with our legal and professional obligations.

We or the third parties mentioned above may occasionally also share personal data with:

- our external auditors, for example in relation to the audit of our organisation, in which case the recipient of the information will be bound by confidentiality obligations
- our professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised but this may not always be possible and the recipient of any of your personal data will be bound by confidentiality obligations

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' as section 17).

## **8 Where your personal data is held**

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described in section 7 '**Who we share your personal data with**'.

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this occurs, see section 10 '**Transferring your personal data abroad**'.

## **9 How long your personal data will be kept**

We will not keep your personal data for longer than we need it for the purpose for which it was collected or as required by law.

As a general rule, we will keep your personal data for as long as is necessary for the purpose for which we are processing it. However, different retention periods apply for different types of personal data which is determined by our retention policy.

Following the end of all of any relevant retention periods we will delete or anonymise your personal data.

If you would like further information about how long we keep your personal data, please contact us (see '**How to contact us**' at section 17).

## 10 Transferring your personal data abroad

It may be sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. This may include countries which do not provide the same level of protection of personal data as the UK or EEA.

We will transfer your personal data outside the UK and EEA only where:

- the UK government has decided the recipient country ensures an adequate level of protection of personal data (known as an adequacy decision); or
- there are appropriate safeguards in place (such as standard contractual data protection clauses published or approved by the UK government/ICO, together with enforceable rights and effective legal remedies for you); or
- a specific exception applies under data protection law.

For more information or for a copy of the appropriate safeguard for any of the transfers below, please contact us using the **How to contact us** information at section 17:

## 11 Automated decision making

We store information about you on our systems to suggest products and services that may be of interest or benefit you using algorithms and automated decision-making technology. This means you may see personalised offers while using our services and personalised communications from us with products and services that may interest you. For example, for insurance products, we may use your age, your current insurance policies and recent transactions you have made to suggest cheaper alternatives or additional cover that could benefit you.

## 12 Your rights

You have the following rights, which you can exercise free of charge. However, we may charge a fee or refuse your request if your request is unfounded, repetitive, or excessive:

- **Access** - You have the right to ask us for copies of your personal data. You can request other information such as where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for
- **Rectification** - You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete.
- **Erasure** (also known as the right to be forgotten) - You have the right to ask us to delete your personal data in certain situations.
- **Restriction of processing** - You have the right to ask us to limit how we use your personal data in certain situations, for example if you contest the accuracy of the data.
- **Data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation or to you in certain situations.
- **To object** - You have the right to object at any time to your personal data being processed for direct marketing (including profiling) and in certain other situations to our continued processing of your personal data, for example processing carried out for our legitimate

interests unless we are able demonstrate compelling legitimate grounds for the processing which override your interests or for establishing, exercising or defending legal claims.

- **Not to be subject to automated individual decision making** - The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
- **The right to withdraw consent** - When we use your consent as our lawful basis, you have the right to withdraw that consent at any time. You may withdraw consents by contacting us at [dataprotection@embignell.com](mailto:dataprotection@embignell.com). Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

If you make a request, we must respond to you without undue delay and in any event within one month.

If you would like to exercise any of those rights, please:

- email, call or write to us—see section 17 ‘**How to contact us**’; and
- provide enough information to identify yourself such as your full name, address and any reference or policy number and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

## **13 Keeping your personal data secure**

We have implemented appropriate technical and organisational measures to keep your personal data confidential and secure from unauthorised access, use and disclosure. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We require our business partners, suppliers and other third parties to implement appropriate security measures to protect personal data from unauthorised access, use and disclosure.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are required to do so.

## **14 How to complain**

Please contact us if you have any queries or concerns about our use of your personal data (see ‘**How to contact us**’ at section 17). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the Information Commissioner’s Office (the UK data protection regulator also known as the ICO).

The contact details for the ICO are:

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113

## **15 Changes to this privacy policy**

We may change this privacy policy from time to time. When we do we will publish the updated version on our website and ask for your consent to the changes if legally required.

## **16 Updating your personal data**

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please contact customer services if any of the personal data you have provided to us has changed, for example your surname or address—see '**How to contact us**' at section 17).

## **17 How to contact us**

You can contact us and/or our Group Data Protection Officer by post or email if you have any questions about this privacy policy or the information we hold about you, to update your personal details, to exercise a right under data protection law or to make a complaint.

Our contact details are below:

### By Email

Group Data Protection Officer/Data Protection Team  
[dataprotection@embignell.com](mailto:dataprotection@embignell.com)

Customer Services

[CustomerServices@usdawprepaid.com](mailto:CustomerServices@usdawprepaid.com)

### By post:

Customer Services, Union Income Ltd, Fleet Street 154-160 Fleet Street, Blackfriars, London, EC4A 2DQ

## **18 Do you need extra help?**

If you would like this policy in another format (for example audio, large print, braille) please contact customer care—see '**How to contact us**' at section 17).