

Affirm U.K. Limited Privacy Notice

Effective Date: October 1, 2024

Who are we?

We're Affirm U.K. Limited ("**Affirm**," "**we**," "**us**," "**our**"). We're registered with the Information Commissioner's Office (the UK data protection authority) under number ZA493127.

This Privacy Notice ("**Notice**") explains how Affirm collects, uses, and shares your information when you request and obtain our financial products, use our website and mobile applications, and otherwise interact with us (our "**Services**"). We also explain your data privacy rights and how you can exercise them.

We update our Notice from time to time and when we do, we include a summary of the changes along with the effective date of those changes. Where the changes are significant, we will let you know by email or on our website or mobile application where applicable.

Getting in touch

For any questions, please contact us at your preferred communication method:

- Get in touch through the Affirm Help Centre [here](#);
- Contact us at 0800 014 8879.

Your rights

You have the right to:

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you.
- **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 your personal data. We may not always be able to comply with your request of erasure for legal or regulatory 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). You also have the right to object where we are processing your personal data for direct marketing purposes. In rare cases, we will not be able to comply with your objection request if we have compelling legitimate grounds for the continued processing which override your interests, or for the establishment, exercise, or defence of legal claims.

- **Request restriction of processing** of your personal data. This enables you to ask us to restrict the processing of your personal data in limited scenarios.
- **Request the transfer** of your personal data to you or to a third party in a portable (machine readable) format where we have collected your consent to process such data or under the contractual necessity lawful basis.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. 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.
- **Right to lodge a complaint** with the Information Commissioner's Office, which can be reached using this link: <https://ico.org.uk/>.

To exercise these rights, you can contact us as the details provided above.

Information we hold about you

We may collect the following types of data about you when you use our Services, either directly with us, through a merchant partner or third-party platform:

- **Personal data:** Full name, title, date and place of birth, national insurance number, gender, marital status.
- **Contact Data:** Home address and previous addresses, billing and delivery address, email and phone number.
- **Identity Data:** Copy of your ID documents and photos or video recordings of you.
- **Residency Data:** Tax residency status and right to live in the UK.
- **Financial Data:** Occupation, number of dependents, residential status, monthly housing costs, employment status, income, employer name.
- **Banking Data:** Bank account online login information, sort code and bank account numbers, bank account details including transaction history, routing numbers and/or debit card numbers, expiry and CVC that you link to your Affirm account or you give us when you use our Services.
- **Credit Data:** Credit reports related to you from consumer reporting agencies at the time of collection and periodically throughout the term of your credit product, details about your financial circumstances and reasons for borrowing.
- **Transaction Data:** Details about your loan and payments you make using our Services and relevant transactions.
- **Profile Data:** Information you provide when you create an account with us, including your email address, password, and account preferences.
- **Customer Service Data:** Information you provide through recorded phone calls, chat conversations, surveys, and email correspondence.

- **Usage and Device Data:** Information collected when you use the Services, including your details about your browser, operating system or device, (such as your MAC address, cookie identifiers, Internet protocol (IP) address, mobile advertising, and other unique identifiers, device ID, Internet service provider, mobile carrier, Internet service provider, location information (including inferred location based off of your IP address), actions that you take while using the Services, information about how you interact with the Services, including the frequency and duration of your activities, information about the links you click, and other information about how you use the Services.
- **Marketing and Communications Data:** Your preferences in receiving marketing communications from us and our third parties (marketing and servicing vendors and merchant partners).
- **Sanctions and PEP Data:** Sanction lists and lists of persons constituting politically exposed persons (“PEP”) including information such as name, date of birth, place of birth, occupation or position, and the reason why the person is on the list in question.
- **Social Media Data:** When you use our website or social media, your social media handle, your interactions with our website or social media channel and direct messages you send to our social media pages.
- **Business Data:** We may collect certain information from business representatives, including registered business name, industry field, business address, revenue, website, and tax identification number.
- **Special Category Data:** We may need to process sensitive information about you that data protection laws call 'special category' data. This is information that can reveal a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, information concerning a person's health, sex life or sexual orientation.

How we collect your personal data

We collect personal data from you and third parties.

- **Directly from you** when you use our Services, including when you create an account or initiate a transaction.
- **Automatically from you when you utilise or interact with our Services.** You can find more information on the tracking technologies that we use and information about how you can accept or decline the tracking technology in our [Cookies Policy](#).
- **From merchants and partners.** We may obtain information about you, such as your billing and shipping address, from third parties like our merchants and partners you interact with, public sources or that we receive from companies that partner with us to provide products and services.
- **From online advertising companies and other advertising and research partners** who may share information about your interests, demographic information, and information about the marketing and advertisements you have seen or clicked on.

- **From social media platforms and other publicly available data sources.** By associating an account managed by a third party with your Affirm account and authorising Affirm to have access to this information, you agree that Affirm may collect, store and use this information in accordance with this Notice. The information we have access to varies by third party site and is controlled by your privacy settings on that site and your authorisation.
- **From Fraud Prevent Agencies (FPA).** When you apply for an account, we may receive your personal information from FPAs. We may also share information about you with them to help prevent fraud, account takeovers, and false applications. Other organisations may use information we share with FPAs about fraud to refuse their services.
- **From Credit Reference Agencies (CRA).** When you sign up, and for as long as you're a customer, we'll exchange details about you with CRAs. We'll use this information to comply with our legal duties and when it's in our legitimate interest to, verify your identity and make sure what you've told us is true; assess whether you can afford to make repayments if you borrow; manage your account with us; trace and recover debts; and make sure our offers are relevant for you. For more information about how the CRAs we work with use your data, read [Experian's CRA Information Notices](#) and [TransUnion Privacy Centre](#).
- **From identity verification services.** We use certain third parties to assist us in order to identify who you are and verify the information you provide in your application for the Service.
- **From financial crime services.** We use certain third parties to assist us in the detection and prevention of financial crime, prevent fraud and money laundering and engage in transaction monitoring and filtering.

Who do we share your personal data with

Affirm shares your personal data as follows:

- **With our Affiliates.** "Affiliates" means companies related by common ownership or control. They can be financial and nonfinancial companies.
- **With service providers.** We engage service providers to perform functions on our behalf, such as processing transactions, marketing, billing and collection, auditing and accounting, professional services, measurement and analytics services, security and fraud prevention, servicers of loans, lines of credits, credit bureaus, maintenance and hosting of our Services, and IT.
- **With our merchants and partners.** We may share your information with merchants and partners you interact with using Affirm. This may include for their marketing purposes, if you consent or as permitted by law.
- **With our advertising partners.** We partner with third parties who assist us in serving advertising regarding the Services. These third parties may use tracking technologies to collect or receive information on the Services and elsewhere on the internet and use that information to provide measurement services and target ads. Third parties may allow other companies to access information about you so that they may market other products you may be interested in.

- **With fraud, credit, identity and financial crime partners.** We share your personal data with relevant partners for the purposes of prevention and detection of fraud, identify verification, determine eligibility, and to carry out credit reference checks.
- **When required by law.** We may disclose any information to external parties if we, in good faith, believe doing so is required or appropriate to: comply with applicable law; comply with law enforcement or national security requests and legal process, such as a court order or subpoena; assist with an investigation and prosecution of suspected or actual illegal activity; protect our customers, employees, or property in emergency situations; or enforce our rights under our terms of service and policies.
- **Corporate Transactions.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganisation, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share personal data with third parties in connection with such transaction.
- **Who you give us permission to share it with.** You may request us to share your personal data to third parties, or you've asked someone to represent you, like solicitors and debt management companies.

How we use your personal data

We use your personal data in the ways described in this Notice and consistent with applicable privacy laws. Here is a list of the purposes for which we use your personal data and the corresponding lawful basis for that use:

Purpose	Lawful Basis for Processing
<p><u>Provide our Services and products.</u> We use your personal data to provide our products and Services. For example, to process transactions, resolve disputes, authenticate and verify identities, collect payments, prevent fraud and other illegal activities, customise the Services, rectify errors and verify the accuracy of data. We may also use data to facilitate your relationship with our merchants and partners who you choose to interact with.</p>	<ul style="list-style-type: none"> ● To perform a contract with you and provide you with our Services; ● In furtherance of our legitimate interest (to provide products and Services that meet customer needs); ● To meet our legal obligations.
<p><u>Respond to your requests.</u> We use your personal data to provide customer service and support, respond to your questions, comments, and other requests.</p>	<p>In furtherance of our legitimate interest (to ensure that customers receive the highest standard of service).</p>
<p><u>Improve our Services and grow our business.</u> We use your personal data to understand our customer base, conduct research and analysis, develop new or improved products and Services, and build relationships with merchants and partners.</p>	<p>In furtherance of our legitimate interest (to provide products and Services that meet customer needs).</p>

<p><u>Improve our models.</u> We may use your personal data to improve our credit models to enhance our product offerings to you and to conduct certain studies with our CRAs.</p>	<p>In furtherance of our legitimate interest (to develop, enhance and grow our business).</p>
<p><u>Communications and marketing.</u> We may use information to provide service update notices and to notify you regarding products, services, and promotions that may be of interest to you, based on your communication preferences. We may combine your information with information we collect from other companies and use it to improve and personalise your experience, including advertising.</p>	<ul style="list-style-type: none"> ● Your consent, with regard to online advertising; ● In furtherance of our legitimate interest (to build and grow our business).
<p><u>Offer, maintain, and improve our website and other online Services.</u> We may process your personal data to monitor the performance of our Services and improve the user experience, and to ensure the security of our Services.</p>	<ul style="list-style-type: none"> ● Your consent, with regard to data collected via cookies; ● In furtherance of our legitimate interest (to build and grow our business and prevent fraud).
<p><u>Comply with legal and regulatory obligations.</u> We may process your personal data to comply with our regulatory obligations or in connection with enquiries from regulators, law enforcement agencies, or parties involved in litigation, in each case anywhere in the world.</p>	<ul style="list-style-type: none"> ● To meet our legal obligations; ● In furtherance of our legitimate interest (to maintain relationships with regulators, law enforcement agencies, and courts).
<p><u>Corporate Transactions.</u> We may use and share your personal data in connection with corporate transactions (in the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganisation, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock).</p>	<p>In furtherance of our legitimate interest (in order to allow us to change or transfer our business).</p>

<p><u>Automated Decisions and Artificial Intelligence.</u> We sometimes make decisions without a human. We do this to decide if, we can give you an Affirm account based on your age, residency, nationality, financial position and other circumstances, like the results of anti-money laundering and sanctions checks; whether you can take out a loan with us, based on information we hold about you, information you've provided and information we get from credit reference agencies. This includes details on whether you've kept up-to-date with payments on any credit accounts.</p>	<ul style="list-style-type: none"> ● To perform a contract with you and provide you with our Services; ● In furtherance of our legitimate interest (to provide products and Services that meet customer needs).
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How we protect your personal data

Affirm stores and processes your information maintaining physical, electronic and procedural safeguards. We maintain physical security measures to guard against unauthorised access to systems and use safeguards such as firewalls and data encryption. We enforce physical access controls to our buildings, and we authorise access to personal data only for those employees or agents who require it to fulfil the responsibilities of their jobs.

Retention of your personal data

We will retain your personal data for as long as is necessary for the purposes set out in this Notice. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable law or court orders), resolve disputes, and enforce our legal agreements and policies.

Where we store or transfer your personal data

Your personal data may be stored and processed by us and our service providers within Canada, the United States, the United Kingdom and the European Union. We will take reasonable steps to ensure such transfer, storage and processing is protected utilising the following safeguards: Canada and the European Union, under the adoption of adequacy and the United States under the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers where relevant. We may also share data with third parties located in territories outside the UK that do not offer a level of data protection comparable to that of the UK. We will take reasonable steps to ensure that where such transfers of your personal data occur, we have put in place safeguards to protect such data and meet requirements of applicable law, such as adoption of the international data transfer agreement or the international data transfer addendum to the European Commission's standard contractual clauses for international data transfers issued by the United Kingdom Information Commissioner's Office and approved by Parliament in accordance with the UK Data Protection Act 2018. You can request a copy of this mechanism using our contact details below. Please keep in mind, however, that foreign governments, courts or regulatory agencies may be able to obtain personal data through the laws of the foreign jurisdiction.

How to make a complaint

If you have a complaint about how we use your personal information, please contact us through the Help Center [here](#) and we'll do our best to fix the problem. You can also reach our Data Protection Officer (DPO) at ukdpo@affirm.com.