

General Privacy Notice

This privacy notice provides a high-level overview about how we use and share personal data in our Business. More detailed information can be found in our corresponding specific Privacy Notices.

We provide data, data analytics and services to our clients for a wide range of purposes as detailed in our corresponding specific Privacy Notices

We also conduct evaluations to determine whether data would be beneficial to our clients or ourselves, and we also share data for this purpose.

We also use personal information to assist our regular business operations. This includes managing data for company and consumer relationships, as well as staff personnel.

1. What data do we collect

The personal data we process depends on the nature of our relationship with you and the services we provide.

For our Client Customer Analytics services, we process pseudonymised transactional data provided by our clients or obtained through an authorised Account Information Services Provider (AISP), including through Open Banking where the individual has provided the permissions required for their account information to be accessed.

Where data is provided by a client, directly identifiable information is removed before it is provided to Serene and replaced with a unique identifier. Serene does not receive the information required to directly identify the individual from that identifier.

We also process limited personal data as part of our ordinary business operations, including information relating to employees, prospective and existing clients, suppliers and other business contacts.

The categories of personal data we may process include:

Information Type	Information Description	Information Source
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Pseudonymised transactional data	Transaction information, account balances, incoming and outgoing payments and other financial behavioural information associated with a pseudonymous identifier.	Our clients or authorised Account Information Services Providers.
Derived customer context	Indicators and insights generated from transactional data relating to changing financial resilience, financial difficulty, vulnerability, scam susceptibility and other changes in customer circumstances.	Generated by Serene through provision of the Services.
Business contact information	Name, job title, organisation, business email address, telephone number and correspondence.	Directly from the individual, their organisation or publicly available business sources.
Employee and contractor information	Contact, employment, payroll, training and other information required to manage the employment or contractual relationship.	Directly from the individual and relevant service providers.
Requests and enquiries	Contact information and other information provided when an individual contacts us or makes a request or enquiry.	Directly from the individual.

Further information about particular processing activities is provided in the relevant specific Privacy Notices.

2. How we use your personal data

We use and otherwise process your personal data on the basis of the legal grounds and purposes described below.

We process personal data and verify the data prior to giving an offer and entering into a contract with you. We also process personal data to document and complete tasks in order to fulfil our contractual obligations towards you.

2.1 Data evaluations

We may process data to evaluate, test and improve our products and services or to assess whether particular data or analytical approaches are suitable for an agreed purpose.

Where evaluations involve client-provided data, processing is carried out in accordance with the relevant contractual terms, Data Processing Agreement and the client's documented instructions.

We apply appropriate safeguards, including data minimisation, pseudonymisation or anonymisation where appropriate, access controls, defined retention periods and other technical and organisational security measures.

2.2 Operating our business

We use personal information for internal business purposes. For example:

- We keep names, job titles, and contact information from our business contacts (such as client and supplier representatives), which we use to manage our connection with them as well as for marketing purposes. Please see our **Business Contact Data Privacy Notice** for more information.
- We collect names, contact information, and other information from customers who contact us, and we use that information to respond to their questions. See our **Consumer Contact Data Privacy Notice** for more information.
- We collect information on our employees and use it to manage our working relationships with them. The information includes work and educational histories, as well as background checks and performance evaluations. Employees can discover more information on the staff intranet.
- We use personal information for legal and regulatory reasons. This could include responding to complaints or questions from consumers or regulators regarding how we have utilised personal information.

2.3 Legal Obligations

In addition to the performance of contracts, processing of personal data also takes place for us to fulfil our obligations under law, other regulations or authority decisions.

3. What is the lawful basis for processing your information

3.1 Legitimate interests

We may process personal data where necessary for our legitimate interests or those of a third party, provided those interests are not overridden by the individual's interests, rights or freedoms.

Examples of our processing based on legitimate interests:

- a. Managing relationships with prospective and existing clients, suppliers and business partners.
- b. Business development and appropriate business-to-business marketing activities.
- c. Improving, developing, testing and monitoring our products and services.
- d. Maintaining the security, availability and performance of our systems and services.
- e. Detecting, investigating and preventing information security incidents and fraud.
- f. Supporting compliance, audit, governance and risk management activities.
- g. Responding to enquiries and providing customer and technical support.

Where required, we undertake a Legitimate Interests Assessment to ensure that the processing is necessary, proportionate and appropriately balanced against the rights and interests of individuals.

3.2 Consent

We sometimes rely on consent to process personal data, but this is relatively rare. Again, please refer to the relevant privacy notices for more details.

3.3 Performance of our contract with you

By subscribing to one of our products or services, you are committing to receiving the services or products described in the applicable website's Terms & Conditions. In order to deliver those services to you, we must collect and utilise some personal information from you.

Some of our employees' data is also processed on this basis.

Our use of personal data is subject to a comprehensive set of safeguards that help to ensure that your rights are respected. These include the information provided in this notice on how your personal data will be used and how you can exercise your rights to receive it, update or restrict it, object to its processing, and complain

if you are dissatisfied. These protections assist us maintain a fair and suitable balance, ensuring that our activities do not jeopardise your interests, basic rights, and freedoms.

4. Who do we share your data with

We may also provide third party service providers access to client information where they support or provide services to us. We will ensure that if we share information with, or provide access to, third party service providers, any such disclosure or access is at all times in compliance with Data Protection Legislation.

The recipients, or categories of recipients, of your information, or information relating to your Client Business Personnel, may be:

- UK regulators, courts and authorities in connection with their duties (such as crime prevention);
- Fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. We and fraud prevention agencies may also enable law enforcement agencies to access and use your information to detect, investigate and prevent crime;
- Third party service providers who support or provide services to us;

4.1 Our clients

The applicable Privacy Notices detail the particular reasons for which we disclose personal data to our clients. Each of our clients will have their own privacy notice that explains how they utilise the data we provide in further detail. The following industries are typical ones in which our target clients operate:

- Financial Services
- Insurance
- Utilities

4.2 Service providers

We and our clients may provide your information to third parties who help us use it for the purposes described in this notice:

- Our databases of personal data may be hosted by third parties on our behalf
- Some of our products and services rely on us sending personal data to third parties who then analyse or enhance it and return the results to us.

- We use cloud-based technologies such as Google Workspace in the course of our ordinary business operations

Typically, these service providers aren't permitted to exploit customer data for their personal gain or to benefit other companies.

4.3 Regulators

We may sometimes need to pass personal data to a regulator such as the Information Commissioner's Office or the Financial Conduct Authority.

4.4 External business partners

We disclose personal data to external business partners with your consent or if this is permitted pursuant to applicable legislation or legitimate interests prevail. External business partners include, for example, vendor partners. See our list of Vendors, suppliers and partners.

4.5 Suppliers

We have entered into agreements with selected suppliers, which include processing of personal data on behalf of us. These can be suppliers of IT development, maintenance, hosting and support.

5. Where we store and process your data

We store and process personal data in the United Kingdom.

We use approved cloud-based service providers to support our business operations. Where applicable, these providers are subject to appropriate contractual, technical and organisational safeguards to protect personal data.

6. How long to we keep your data for

We retain personal data only for as long as necessary for the purpose for which it was collected and in accordance with our Data Retention Policy, applicable contractual requirements and legal or regulatory obligations.

Retention periods vary depending on the type of information and purpose of processing. Client-provided data processed in delivering Serene services is retained in accordance with the applicable client contract and Data Processing Agreement.

Where personal data is no longer required, it is securely deleted or anonymised in accordance with our retention and disposal procedures.

7. Use of automated decision making

Our services involve data modelling, behavioural analytics and machine learning to identify patterns, generate indicators and provide Customer Context Intelligence to our clients.

Serene's outputs are designed to support our clients' decision-making and do not themselves make decisions that produce legal or similarly significant effects on individuals.

Where Serene acts as a Data Processor, our processing is carried out in accordance with the client's documented instructions and the applicable contractual arrangements.

Further information about processing undertaken as part of our Client Customer Analytics services is provided in the relevant Privacy Notice.

8. Your rights in relation to the data processing we carry out

- **Access:** You have the right to know what personal data we have on you, as well as other information about how we use it.
- **Rectification:** If the information we have about you is inaccurate or out of date, you have the right to request that we update it.
- **Objection to legitimate interests:** If you disagree with us using your personal information on the basis of legitimate interests, you have the right to object. We will then reassess the extent to which we can continue to utilise the data given your specific circumstances.
- **Erasure:** In certain instances, you may request that we delete your personal information from our systems. However, this normally does not apply to all of your data because we may have a valid purpose for keeping some of it.
- **Withdrawal of consent:** Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing carried out before consent was withdrawn.

- **Objection to direct marketing:** You have the right to object at any time to the use of your personal data for direct marketing. Where you object, we will stop processing your personal data for that purpose.
- **Restriction:** In certain cases, you may request that we limit how we use your personal information.

Please refer to our **Consumer Contact Privacy Notice** for information about how we will handle your personal data in connection with complaints and enquiries.

Your request to exercise your rights as listed above will be assessed given the circumstances in each individual case. Please note that we may also retain and use your information as necessary to comply with legal obligations, resolve disputes, and enforce our agreements.

Any request for access to or a copy of personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with **Data Protection Legislation**. We will comply with our legal obligations as regards any individual's rights as a data subject.

9. Website cookies

We use cookies and similar technology to differentiate you from other website visitors. This allows us to offer you a decent browsing experience while also personalising and improving the website.

A cookie is a tiny file containing letters and numbers that we store on your device. Similar technology is any other technology that stores or accesses data from your device. We use the following types of cookies and related technologies (referred to here as 'cookies'):

- **Cookies that are strictly necessary:** These cookies are essential for the website to function properly.
- **Cookies used for analytics and performance purposes:** These cookies allow us to detect and count the number of visits to the website, as well as track how visitors move around it while they are using it. This allows us to improve how our website works.

Our browser settings may allow you to refuse the setting of certain cookies. The "Help" or "Internet Settings" functions within your browser should tell you how. For information on how to manage cookies on popular browsers please see the following links:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Microsoft Internet Explorer](#)
- [Apple Safari](#)

Alternatively, you may wish to visit <http://www.allaboutcookies.org/> which contains detailed information on cookies and how to delete, restrict or block them on a wide variety of browsers. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

To opt out of being tracked by Google Analytics across all websites, you may be able to use the tool provided by Google available at: <http://tools.google.com/dlpage/gaoptout>.

Please be aware that if you select to refuse or restrict cookies, the full functionality of the Site may no longer be available.

10. Your right to complain

If you have a complaint about our processing of your data, you can contact our Data Protection Officer at dpo@myserene.io

Please see our **Consumer Contact Privacy Notice** for information on how we will handle your personal information in response to complaints and questions.

You also have the right to file a complaint with the Information Commissioner's Office (ICO), which oversees the processing of personal data in the United Kingdom. You can do this online at www.ico.org.uk or by calling 0303 123 1113, or by writing to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Version Control

Title	General Privacy Notice (PC-6)			
Description	Notice Document			
Created By	Information Security Office			
Date Created	2025			
Maintained By	Information Security Office			
Approved By	Board of Directors			
Version Number	Modified By	Modifications Made	Date Modified	Status
1.0	ISO	Initial creation	2024	Superseded
2.0	ISO	Reviewed for 2025 Audit purposes - formatting overhauled	04/2025	Superseded
2.1	ISO	Reviewed for 2026 Audit purposes - updates made to reflect current operating model	06/2025	Live

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