SMARTLYY

Privacy Policy

Effective 30 October 2026 · Smartlyy Ltd, company number 16587096, registered in England and Wales

Our regulatory status

Smartlyy Ltd is a technology company. It is not a bank and is not authorised or regulated by the Financial Conduct Authority. Smartlyy does not hold client money. Regulated services such as payment accounts, currency conversion and cash out are provided by licensed partners, and each partner verifies the users it serves.

CONTENTS

1. Who we are
2. What this policy covers
3. Information we collect
4. How we use your information
5. Who we share it with
6. International transfers
7. How long we keep it
8. Security
9. Your rights
10. Automated checks
11. Cookies
12. Children
13. Changes to this policy
14. Contact us

1. Who we are

Smartlyy Ltd (“Smartlyy”, “we”, “us”) is a company registered in England and Wales, company number 16587096. Our address is 20-22 Wenlock Road, London N1 7GU, United Kingdom. Smartlyy is the controller of the personal data described in this policy, which means we decide how and why it is used.

You can contact us at info@smartlyy.co.uk.

2. What this policy covers

Smartlyy provides a cross border money transfer and account service, starting with transfers from the United Kingdom, Europe, the United States and the United Arab Emirates to Pakistan. This policy applies to our website, our mobile and web applications and any related service (together, the “Services”). It applies to senders, recipients, account holders, business users and visitors.

We process personal data in line with the UK General Data Protection Regulation, the Data Protection Act 2018 and, where they apply to you, the data protection laws of the country in which you live.

3. Information we collect

Information you give us

- **Identity and contact details:** name, date of birth, nationality, country of residence, address, email address, phone number, and a photograph or selfie used for identity checks.
- **Identity documents:** passport, national identity card or driving licence, and proof of address.
- **Business details** for business users: company name and registration, directors, beneficial owners and supporting documents.

- **Transaction details:** amounts, currencies, purpose of a transfer, source of funds, and recipient details such as name, phone number, email address, bank account, mobile wallet or digital wallet address.
- **Communications:** messages to our support team, survey answers and feedback.

Information we collect automatically

- **Technical data:** IP address, device identifiers, browser and operating system, log data and approximate location.
- **Usage data:** how you use the Services, including pages and features used and error reports.
- **Wallet and blockchain data:** your public wallet address and on chain transaction identifiers. Where you use a non custodial wallet, we do not receive or store your private keys or recovery phrases.

Information from others

- Identity verification, sanctions, fraud prevention and screening providers.
- Our licensed payment, banking and card partners.
- Senders, who may give us details about a recipient so that a transfer can be made.
- Public sources, such as company registers and sanctions lists.

---

4. How we use your information

Purpose	Legal basis
Create and manage your account and provide the Services, including processing transfers.	Performance of a contract
Verify your identity and the identity of recipients and business owners.	Legal obligation; legitimate interests
Screen against sanctions lists and prevent, detect and report fraud, money laundering and terrorist financing.	Legal obligation; legitimate interests

Keep the Services secure and resolve technical problems.	Legitimate interests
Respond to your questions and complaints.	Performance of a contract; legitimate interests
Improve and develop the Services, including analysis of usage.	Legitimate interests; consent where required for cookies
Send you product news and offers. You can opt out at any time.	Consent, or legitimate interests where the law allows
Establish, exercise or defend legal claims and meet our legal and regulatory duties.	Legal obligation; legitimate interests

Where we rely on legitimate interests, we weigh them against your rights and freedoms. Where we rely on consent, you can withdraw it at any time, without affecting what we did before.

---

5. Who we share it with

We share personal data only where needed to provide the Services, to meet our legal duties, or with your permission. Recipients include:

- **Licensed payment, banking and payout partners,** including Latitude, Bridge and Thunes, that provide accounts, currency conversion and payouts. They act under their own licences and may use your data to meet their own legal duties.
- **Fiat on ramp and off ramp providers.** If you choose to buy or sell digital assets through a third party provider, that provider collects and uses your data as an independent controller under its own privacy policy and terms. We recommend you read them before you proceed.
- **Identity verification and screening providers** that check documents, liveness and sanctions status.
- **Wallet infrastructure providers,** including Privy, that make non custodial wallets available to you.

- **Service providers** for cloud hosting, analytics, customer support and communications, who act on our instructions.
- **Professional advisers, auditors and insurers.**
- **Authorities and courts,** such as regulators, tax authorities and law enforcement, where the law requires or permits it.
- **A buyer or investor** if we sell or restructure our business, under confidentiality terms.

We do not sell your personal data, and we do not share it with third parties for their own marketing.

---

6. International transfers

Our service moves money across borders, so your data may be sent to or accessed from countries outside the United Kingdom, including countries in the European Economic Area, the United States, Canada, the United Arab Emirates and Pakistan. Some of these countries may not have the same level of data protection as the United Kingdom.

When we transfer personal data, we use a recognised safeguard, such as a UK adequacy decision, the UK International Data Transfer Agreement or the UK Addendum to the European Commission's standard contractual clauses. You can ask us for details by using the contact information below.

---

7. How long we keep it

We keep personal data for as long as you have an account with us and as long as needed for the purposes above. Anti money laundering rules require us to keep identity and transaction records for at least five years after our relationship ends. After that, we delete or anonymise the data unless we need it for a legal claim or the law requires us to keep it longer.

Blockchain transactions are public and permanent. We cannot alter or delete information recorded on a public blockchain.

8. Security

We use technical and organisational measures to protect personal data, including encryption in transit and at rest, access controls, and monitoring. No system is completely secure. You are responsible for keeping your login details and your wallet recovery methods safe. If we become aware of a breach that is likely to put your rights at risk, we will notify you and the regulator as the law requires.

9. Your rights

Under the UK GDPR you have the right to:

- access the personal data we hold about you;
- ask us to correct inaccurate or incomplete data;
- ask us to delete your data, in some circumstances;
- ask us to restrict how we use your data, in some circumstances;
- receive your data in a portable format, or ask us to send it to another provider;
- object to uses based on our legitimate interests, and to direct marketing at any time; and
- withdraw consent where we rely on it.

To use a right, contact us using the details below. We aim to respond within one month. We may ask you to confirm your identity first. Some rights are limited where we must keep records by law, for example under anti money laundering rules. If you live outside the United Kingdom, you may have additional rights under local law, which we will respect where they apply.

If you are unhappy with how we handle your data, please tell us first so that we can put it right. You also have the right to complain to the UK Information Commissioner's Office at ico.org.uk.

10. Automated checks

We and our partners use automated tools to check identity documents, screen for sanctions and detect fraud. These checks can lead to a refusal, delay or restriction on an account or a transfer. If a decision affects you significantly, you can ask for a person to review it and can tell us your point of view.

11. Cookies

Our website and applications use cookies and similar technologies. Essential cookies keep the Services working and secure. Where we use analytics or similar cookies that are not essential, we ask for your consent first. You can change your choices in the cookie settings or in your browser at any time.

12. Children

The Services are for people aged 18 and over. We do not knowingly collect personal data from anyone under 18. If you believe a child has given us personal data, contact us and we will delete it.

13. Changes to this policy

We may update this policy from time to time. We will post the new version here with a new effective date. If a change is material, we will tell you by email or through the Services before it takes effect.

14. Contact us

Smartlyy Ltd
20-22 Wenlock Road, London N1 7GU, United Kingdom

Company number 16587096
Email: info@smartlyy.co.uk
