



Cluberly Privacy Policy

Version 1.2

Effective Date: 04/11/2025

Last Updated: 04/11/2025

1. Who We Are

Cluberly App Limited ("Cluberly", "we", "our", "us") is a company registered in the United Kingdom. We are committed to protecting your privacy and handling your personal data responsibly. This Privacy Policy explains how we collect, use, share and protect your personal data when you use our services.

IDT Financial Services Limited ("IDT") is the issuer of the Cluberly card. IDT is an independent controller of your personal data in relation to card operations. IDT's privacy policy is available at <https://idtfinance.com/privacy-policy/>.

Bondsmith Savings Ltd acts as a joint controller of your personal data in relation to the provision of the Bank Deposit Sweep account. Bondsmith Savings Ltd's privacy policy is available at (link to be provided once integration is complete).

2. What Personal Data We Collect

We may collect the following types of personal data:

- Contact Information: Name, email, phone number, postal address, date of birth.
- Identification Documents: Passport, driving licence, utility bills.
- Financial Information: Bank account details, card numbers (partial), transaction data.
- Device Information: IP address, browser type, operating system, device identifiers.
- Usage Data: Page visits, interaction logs, error reports.
- Marketing Preferences: Opt-in/opt-out status, hashed data for advertising relevance.

3. How We Use Your Personal Data

We use your data to:

- Provide and improve our services.
- Process payments and issue cards.
- Verify identity and comply with legal obligations (e.g. anti-money laundering).
- Communicate with you and respond to enquiries.
- Send newsletters and promotional content (with your consent).
- Conduct research and analytics.

4. Sharing Your Personal Data

We may share your data with:

- Service Providers: Payment processors, fraud detection, hosting, analytics.
- Regulators and Law Enforcement: Where required by law or to protect our services.
- Advertising Partners: With consent, for tailored campaigns.
- Professional Advisors: Legal, audit, and accounting services.
- Affiliates and Business Transfers: In case of mergers or acquisitions.

5. International Transfers

Your data may be transferred outside the UK. We ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the UK authorities.

6. Data Retention

We retain your data only as long as necessary:

- Up to six years after account closure for compliance with financial regulations.
- Shorter periods for marketing and analytics data, unless consent is withdrawn.

7. Security Measures

We implement robust security controls, including:

- Encrypted transactions and secure servers.
- Access controls and confidentiality agreements.
- Regular system monitoring and staff training.

8. Your Rights

You have the right to:

- Access and correct your data.
- Request deletion or restrict processing.
- Object to marketing and withdraw consent.
- Port your data to another provider.

To exercise your rights, contact us at privacy@cluberlyapp.com.

9. Cookies

We use cookies to improve your experience. For details, see our Cookie Policy.

10. Third-Party Links

Our website/app may contain links to third-party platforms. We are not responsible for their privacy practices.

11. Complaints

If you have concerns, contact us at <https://www.ico.org.uk>.

12. Contact Us

For questions or feedback, email privacy@cluberlyapp.com or write to:

Cluberly App Limited, North Lodge, Hawkesyard, Armitage Lane, Rugeley, WS15 1PS