MBL PRIVACY POLICY

1. IMPORTANT INFORMATION

WHO WE ARE

MBL Solutions Limited, a company registered in England and Wales, company number 04300822 (referred to as "MBL", "we", "us" or "our" in this privacy policy) respects your privacy and is committed to protecting your personal data.

PURPOSE OF THIS POLICY

This policy explains what personal data we collect from visitors to our website and users of our services, including mobile applications, why we collect it, how it is used, stored and protected, and the rights available to you. We encourage you to read it carefully so that you fully understand how we handle your personal data.

This website is not intended for children (under the age of 18) and children are prohibited from registering as per our terms. By placing an order with us and/or giving data to us you confirm that you are over the age of 18.

This policy should be read alongside any other privacy notice or fair processing notice we provide in specific contexts, for example, when you make a purchase or register for a service. Where a separate notice applies, it will supplement this policy rather than replace it. Our website terms and conditions and cookie policy (accessible via the links in the footer of our website) also apply to your use of our website and should be read together with this policy.

OUR DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with this policy and for assisting individuals who wish to exercise their rights under data protection law. If you have any questions about this policy, or wish to exercise a legal right, please contact our DPO using the details below.

Name of DPO: Katy Smith

Email address: DataProtection@love2shop.co.uk

Postal address: MBL DPO, 20 Chapel Street, 4th floor, Love2Shop, Liverpool, L3 9AG

2. PERSONAL DATA WE COLLECT

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows

We may collect, use, store and transfer different kinds of personal data about you in our role as either data controller or data processor which we have grouped together as follows:

- **Identity data** includes first name, last name, username or similar identifier.
- **Contact data** includes address, email address and telephone numbers.

- **Commercial data** includes details about products and services you have purchased or received, together with related financial information, such as pricing, payment and transaction details.
- **Technical Data** may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile data** includes your username and password, orders made by you, and feedback.
- **Usage data** includes information about how you use our website, products and services. This also includes data collected as part of our marketing email tracking activities, including: confirmation that you opened our email; when you opened our email; how many times you opened our email; from which server you opened our email, including the server's IP address (and therefore location); which type of device, operating system and/or software you used to open the email; which link(s) to our website(s) you clicked within the email; and when combined with Google Analytics data, certain activity you subsequently carry out on our website(s)
- **Marketing and Communications data** includes your preferences in receiving marketing from us and our authorised third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Profile, Contact, Usage data through the use of our website or products, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Create an account;
  - Make an enquiry or order for products or services;
  - Request marketing communication to be sent to you or you otherwise subscribe to publications;
  - Enter a survey; or
  - Give us feedback or contact us
- **Information provided by the organisation you represent.** The organisation you represent will share Identity sand Contact data with us so we can send you an invitation to activate your account and create your user profile or fulfil orders to you on their behalf.
- **Automated technologies or interactions.** When you access or use our websites, we collect some information automatically which may be collected through cookies, web beacons, java script, log files,

pixels, and other technologies (collectively, "Technologies"). Please review our Cookie Notice for additional information and to opt-out of any collection.

- **Third parties or publicly available sources.** When we wish to send you information in your professional capacity about our services and business we may collect your Contact Data about you from various third parties such as advertising networks, and public sources such as LinkedIn or Facebook. We may also receive Technical Data about you from analytics providers such as Google.

PERSONAL DATA BELONGING TO OTHERS

If you provide us with any personal data that does not belong to you, you must:

- Ensure the data owner is over the age of 18;
- You do so having first obtained the data owner's consent and be able to evidence you have authority to provide this data, in accordance with all applicable data protection laws;
- Be advised that the terms of this privacy policy shall apply to such personal data as if the data owner had provided us with their personal data directly; and
- Agree that we may inform the data owner that you have provided us with their personal data.

3. OUR ROLE

DATA CONTROLLER

MBL is the controller for the purposes outlined below and is responsible for your personal data:

- **Provision of services and fulfilment of orders.** To provide our services, operate our websites, respond to your enquiries, fulfil your requests and process your orders (where not acting as a Data Processor) and payments. This also includes bug reporting and resolution, and performing upgrades and routine maintenance.
- **Service communications.** To send you important information relating to our services, including updates to our terms and conditions, policies, or other administrative matters. These communications are not optional as they are necessary to keep you informed about your relationship with us.
- **Marketing communications.** Where you have given your consent or where we otherwise have a lawful basis to do so, to send you marketing communications in accordance with your preferences. You may withdraw your consent or opt out at any time.
- **Analytics and service improvement.** To understand how our services are used and accessed, to conduct research and analysis, and to evaluate and improve the quality and performance of our services.
- **Identity verification, security and fraud prevention.** To verify your identity and, where relevant, your location, in order to provide access to your account and facilitate online transactions. This also includes risk management, fraud detection and prevention, and ensuring compliance with applicable laws and regulations.
- **Protection of our services and users.** To protect our websites and services from unauthorised access and misuse. Where necessary, to investigate, prevent or take action in respect of unlawful activity, suspected fraud, potential threats to the safety of any person, or violations of our terms of use or this privacy policy.
- **Legal compliance and regulatory obligations.** To comply with our legal obligations, including disclosing information where required by law or legal proceedings, such as in response to lawful requests from public authorities, regulators, or law enforcement agencies, including national security requirements.

- **General business administration.** Where necessary for the administration of our business, including accounting, record-keeping, and the exercise or defence of legal rights and obligations.

We will only use your personal data for the purposes for which it was collected, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis on which we do so.

DATA PROCESSOR

We may occasionally act as a Data Processor, depending on the contractual arrangements we have with our business clients. An example would be where we fulfil orders to you on behalf of a client which has engaged with us under a contract of services we will act as a Data Processor of the client.

4. USE OF YOUR PERSONAL DATA AND LAWFUL BASIS

We have set out below, in a table format, a description of all the ways we use your personal data, and which of the lawful basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Consent: you have given clear consent for us to process your personal data for specific purpose, such as marketing communication.

Contract: processing your data where it is necessary to perform the contract we are about to enter or have entered with you.

Legal Obligation: processing is necessary for compliance with a legal obligation to which we are subject.

Legitimate interests: processing is necessary for the legitimate interests of MBL in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our legitimate interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of Data**	**Lawful basis for processing**
Provision of services and fulfilment of orders and associated communication*	Identity Contact Commercial Technical Profile Usage	Contract
Service communications*	Identity	Legitimate interests

	Contact Commercial Profile	
Marketing communications	Identity Contact Commercial Profile Marketing and Communications	Consent
Analytics and service improvement	Technical Profile Usage	Legitimate interests
Identity verification, security and fraud prevention	Identity Contact Technical Profile Usage	Legitimate interests Legal obligation
Protection of services and users	Identity Technical Usage	Legitimate interests
Legal compliance and regulatory obligations	Identity Contact Commercial	Legal obligation
General business administration	Identity Contact Commercial Profile	Legitimate interests
To invite you to create your account on our platforms	Identity Contact	Contract (with the organisation you represent)

** Communication may be sent by email, telephone (including SMS), via social media platforms (i.e. Facebook/ X /Instagram etc.), post, and/or any other appropriate means including new technology.*

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be

relevant for you (we call this marketing). You will receive marketing communications from us (or on our behalf using our third party authorised companies) if you have requested information from us or purchased our services and you have not opted out of receiving that marketing.

If you no longer want to receive promotional material, you can ask us or third parties to stop sending you marketing messages at any time by following the links on any marketing message sent to you or by contacting us at any time on mbloperations@mblsolutions.co.uk. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. SECURITY AND PRIVACY

We use internet standard encryption technology to scramble your data when you transmit it to us. This process is known as TLS (transport layer security) and provides you with the maximum practicable level of security. To check that you are in a secure area of our site look at the bottom of your browser and you will see a closed padlock or an unbroken key.

Your security and peace of mind are of the utmost importance to us, and we are constantly striving to safeguard them. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out above.

- Internal Third Parties within the PayPoint Group, which MBL is a part of. We may share your personal information with other companies within the PayPoint Group where this is necessary:
    - to provide, administer and support the products and services you use;
    - to manage our relationship with you and your business;
    - to prevent fraud, manage risk, comply with legal and regulatory obligations and protect our legal rights;
    - to improve, develop and market products and services; and
    - to identify other products or services offered by members of our group that may be relevant to your business.

  We will only share personal information within our group where there is a legitimate business need and a lawful basis for doing so, and all group companies are required to handle personal information in accordance with applicable data protection laws.
- External Third Parties, where your personal data may be disclosed:

- to appropriate investigatory and regulatory authorities when required by law to do so
- to a supplier if required to fulfil a service to you
- to payment processors to purchase goods & services

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

7. INTERNATIONAL TRANSFERS

Although we are based in the UK, we may use the services of external third parties from many parts of the world. As a result, the information we collect about you may on occasion be transferred to, stored and used in other countries, including those which are outside of the UK/EEA. Any transfer of personal data outside the UK will be in accordance with the ICO's recommended data transfer models. We will also take steps to ensure that your personal data receives appropriate safeguards in the jurisdictions in which we process it, including through written data processing terms, data transfer agreements and risk assessments, where required.

8. USE OF ARTIFICIAL INTELLIGENCE

We may use artificial intelligence ("AI"), machine learning and automated technologies to support our business operations and the delivery of our services. For example, our employees may use AI-powered tools to help retrieve information, review and draft documents, analyse data, and prepare summaries.

Where these tools process personal data, we will only do so where we have a lawful basis for the processing and have implemented appropriate technical and organisational security measures to protect that data.

Access to personal data by AI tools is restricted to secure, closed systems operated within the PayPoint Group and approved service providers.

We do not use solely automated decision-making to make decisions relating to you. If this changes, we will notify you in accordance with applicable law.

9. YOUR RIGHTS

If your personal data is stored, transferred or processed at any time by MBL, your rights with regards to that data are as follows:

Right of access ("Data Subject Access Request")

Further to the information that is set out within this privacy policy, you have the right to obtain from us without undue delay whether or not your personal data is being processed by us, and, where that is the case, access to the personal data and the following information: a) the purposes of the processing;

a) the categories of personal data concerned;

b) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

c) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

d) the existence of the right to request from us rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing;

e) the right to lodge a complaint with a supervisory authority (this being UK's Information Commissioners Office);

f) where the personal data are not collected from you, any available information as to their source;

g) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you, in accordance with the GDPRs. Considering the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure ('right to be forgotten')

You have the right to obtain from us the erasure of personal data concerning you without undue delay, in accordance with the GDPRs. This shall not apply to the extent that processing is necessary; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

If you exercise your right to erasure, you understand, agree and acknowledge that we may be unable to deliver some or all the products and services that you have ordered and/or enquired about.

Right to restriction of processing

You have the right to obtain from us the restriction of processing, in accordance with the GDPRs. Where processing has been so restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

If you exercise your right to restriction of processing, you understand, agree and acknowledge that we may be unable to deliver some or all the products and services that you have ordered and/or enquired about.

Right to data portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another without hindrance from us where:

a) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) or on a contract pursuant Article 6(1)(b); and

b) the processing is carried out by automated means.

Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data, in accordance with the GDPRs. In such circumstances we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. If you exercise your right to object, you understand, agree and acknowledge that we may be unable to deliver some or all of the products and services that you have ordered and/or enquired about.

Right to complain

You have the right to complain regarding the handling of your personal data. We take any complaints raised seriously.

10. COMPLAINTS

If you are unhappy with how we have handled your personal data, you have the right to complain. We are required to acknowledge complaints within 30 days and respond 'without undue delay'.

How to complain

You can submit your complaint via:

- **Email address**: mbloperations@mblsolutions.co.uk
- **Phone:** 0191 2504530
- **Postal address:** MBL DPO, 20 Chapel Street, 4th Floor, Love2Shop, Liverpool, L3 9AG

If you are not satisfied with our response, you can contact the Information Commissioner's Office (ICO), who are an independent supervisory authority for data protection in the UK. Their details are:

Postal: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Website: ico.org.uk

11. VARIATIONS

We may vary this policy at any time and any variations that we make will be displayed on this page by uploading an updated version of the policy.

You should check this page frequently for any variations and you agree that this is an appropriate method to vary this policy.

This policy was last updated 23 October 2026.