

Wonderful Privacy Policy – (2.5)

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INTRODUCTION

Wonderful Payments Limited and Wonderful Organisation Limited (“we” or “our”) respect your privacy and are committed to protecting your personal data. This privacy notice lets you know how we look after your personal data when you visit our websites at wonderful.co.uk, wonderful.one, wonderful.support and wonderful.org (our “Websites”), our smartphone Apps and/or use our services, and tells you about your privacy rights and how the law protects you. All references in this policy to “our App” refer to the apps owned by Wonderful Payments and made available to you in the Apple App store and Google Play Store.

We are a data controller and this policy applies where we are acting in this capacity with respect to the personal data of our website visitors and service users. This policy governs how we determine the purposes and means of the processing of that personal data. It applies to anyone visiting our Websites, or that uses our Apps or Services, including:

Merchants

- Businesses – A limited company, sole trader or partnership (which is not a Charity) and operates in the United Kingdom.
- Charity – A charity operating in the United Kingdom and registered with a Charity Regulator.

Consumers

- Donors – A person who uses our Service to donate to a Charity.
- Payment Service Users (PSUs) – A person who uses our Service to make payments to our Customers.
- Fundraisers- A person (other than the Charity) who solicits or procures Donations for you (when you are a Charity) in connection with a fundraising event on our Platform.

References to “you” will include any Customer, End User, Merchant, Consumer, or other user as described above, as the context so requires.

This Website uses cookies in accordance with our Cookie Policy available on our Website at wonderful.co.uk.

This privacy notice is layered so you can navigate to the section you need, and should be read alongside our Cookies policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

WHO WE ARE

Wonderful Payments Limited (WP) is a company registered in England and Wales under company number 12601267, with the registered office at Rise, 41 Luke Street, EC2A 4DP.

WP is authorised and regulated by the Financial Conduct Authority under the Payment Services Regulations 2017 (FRN: 964289). You can check our authorisation on the FCA Register here <https://register.fca.org.uk/s/>.

Wonderful Organisation Limited is a non-profit organisation registered in England and Wales under company number 09818383, with the registered office at Rise, 41 Luke Street, EC2A 4DP.

WHAT THIS PRIVACY NOTICE COVERS

This notice covers wonderful.co.uk and wonderful.support which are both operated and controlled by Wonderful Payments Limited. Wonderful Payments Limited is the data controller responsible for your personal data when using Wonderful Payments websites and apps.

Wonderful.org is operated by Wonderful Organisation Limited, a separate organisation from Wonderful Payments Limited. Where you donate or engage with fundraising activity via wonderful.org, Wonderful Organisation and Wonderful Payments Limited act as joint controllers of your personal data (see 'Joint controllers' below for information on what this means and who to contact).

INDEPENDENT AND JOINT CONTROLLERS

When you make a donation or otherwise engage with fundraising activity through wonderful.org, your personal data is jointly controlled by:

- Wonderful Organisation, which decides why this data is collected i.e. to solicit, process and manage Donations and the fundraising relationship with you; and

- Wonderful Payments Limited, which operates the shared platform that determines how this data is technically collected, stored, and processed.

We have a joint controller arrangement in place setting out our respective responsibilities in more detail, in line with Article 26 UK GDPR.

Wonderful Payments Limited also separately processes some of this same data as an independent controller, as a firm in its own right and not jointly with Wonderful Organisation, for its own anti-money laundering, sanctions screening, and other regulatory obligations.

SCOPE & PURPOSE OF THIS PRIVACY NOTICE

This policy applies to data you may provide to us or otherwise make available to us through using any of our Websites / subdomains, apps, or when you sign up or otherwise use our Services.

This privacy notice aims to give you information on how we collect, process, and store your personal data through your use of all Websites and associated subdomains: wonderful.co.uk, wonderful.support, and wonderful.org.

The rest of this notice (including the sections on data retention, your legal rights, and our Data Protection Officer's contact details) applies to the processing of your data by both Wonderful Payments Limited and Wonderful Organisation.

OUR DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) who oversees this notice and will respond to questions about how we handle personal data, including requests to exercise your legal rights. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Our DPO's contact details are:

Data Protection Officer
41 Luke Street
London
England
EC2A 4DP

Email address: dataprotectionofficer@wonderful.co.uk

Telephone number: +44 (0) 33 3443 3333

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). If your complaint relates to a regulated payment service, you may also have the right to complain to the Financial Ombudsman Service (FOS). We would, however, appreciate the

chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

This Website and App are not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES TO YOUR PERSONAL INFORMATION

This version was last updated on 26th August 2026. We review this notice at least annually and whenever there is a material change to our processing or to data protection law.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our App and Website may include links to third-party Websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party Websites and are not responsible for their privacy statements. When you leave our Websites, we encourage you to read the privacy notice of every third-party website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an identifiable individual .

We may collect, use, store and transfer different kinds of personal data about you:

1. **Identity Data** includes first name, title, last name, username, photo ID (in the case of Charities and Customers only) or similar identifier.
2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
3. **Technical Data** includes internet protocol (IP) address, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Websites or App.
4. **Profile Data** includes your interests, preferences, feedback; and if you carry out charitable activities, fundraising habits and supported causes.
5. **Usage Data** includes information about how you use our Website, products and services.

6. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, and your communication preferences.
7. **Financial Data** includes information such as bank account numbers and sort codes, that you submit to us.
8. **Transaction Data** includes information relating to payments or Donations made by Consumers using our Service.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data. Aggregated Data is not considered personal data in its own right, but if we combine it with other data so that it identifies you, we treat the combined data as personal data under this notice.

SPECIAL CATEGORY DATA

We may process **Special Category Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) as part of our client inception procedures.

We will only process this data where the law allows a specific condition for special category processing.

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 with you (for example, to process a Donation). In this case, we may have to cancel a service we provide you, but we will notify you if this is the case at the time.

3. HOW YOUR PERSONAL DATA IS COLLECTED

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

1. **Direct interactions: when you register, apply for our Services, subscribe to communications, request marketing, or give us feedback by form, post, phone, or email.**
2. **Automated technologies or interactions.** As you use our Website or App, we automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. See our Cookie Policy for details on your choices.
3. **Third parties or publicly available sources:** including analytics providers (such as Google), credit reference and fraud prevention agencies, sanctions and PEP screening providers, and publicly available registers (such as Companies House) used for onboarding checks.

OUR CUSTOMERS

MERCHANTS (CHARITIES & BUSINESSES)

A Merchant must sign up and register with our Website(s) or App in order to receive our Service(s) from us. When you register with us, we will collect various personal information including relevant contact names and email addresses, and other information identified in paragraph 4 below.

CONSUMERS**PAYMENT SERVICE USERS (PSUs)**

If you are an PSU who uses our Service in order to make payments to our Customer, then we will collect certain personal data relating to payments that you make using our Service as identified in paragraph 4 below.

DONORS

If you are a Donor, you may elect to make Donations to your chosen Charity using our Service, in which case we will collect certain personal data relating to payments that you make to your chosen Charity as identified in paragraph 4 below.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Our main lawful bases are:

- i. Performance of a contract with you;
- ii. Compliance with a legal or regulatory obligation (in particular the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002, and the Sanctions and Anti-Money Laundering Act 2018); and
- iii. Our legitimate interests (provided these are not overridden by your interests or fundamental rights).

Since 5 February 2026, the Data (Use and Access) Act 2025 has introduced a 'recognised legitimate interests' basis for defined purposes such as crime prevention and detection and safeguarding, which does not require the usual balancing test. There are therefore certain data processing activities that Wonderful is able to perform without your consent, for example, processing data for onboarding for the purposes of AML screening.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

The table below sets out our main purposes for processing. We may process data on more than one lawful ground where relevant, please contact our DPO for details of the specific ground relied on for a given activity.

Purpose / activity	Data types & lawful basis	Notes
Registering you as a Merchant or App user	Identity, contact, financial, transaction. <i>Performance of a contract</i> <i>Legitimate interests (provision of the Services)</i>	Applies to Merchants and their authorised users.
Onboarding due diligence, AML, sanctions and PEP screening (including biometric ID verification)	Identity, contact, special category and biometric data <i>Compliance with a legal obligation (MLR 2017 and related legislation)</i>	
Processing payments, donations, fees and charges	Identity, contact, financial, transaction <i>Performance of a contract</i> <i>Legitimate interests</i>	
Surveys	Identity, contact, profile, usage, marketing and communications, <i>Performance of a contract</i> <i>Legitimate interests (understanding how our Service is used)</i>	Participation is optional
Administering and securing our Websites, Apps, and business (troubleshooting, testing, hosting, fraud prevention)	Identity, contact, technical <i>Legitimate interests (running our business and network security)</i> <i>Compliance with a legal obligation</i>	
Analytics, and developing our Website, App, and Services	Identity, contact, profile, technical, usage, marketing and communications	Subject to your cookie preferences for non-

	<i>Legitimate interests (understanding and improving our Service)</i>	essential analytics (see Cookie Policy).
Marketing and tailored suggestions	Identity, contact, technical, usage, profile <i>Legitimate interests</i>	See 'Marketing' below.

AUTOMATED DECISION-MAKING

Where any stage of onboarding, fraud, monitoring, transaction screening or other similar decisioning is carried out solely by automated means and produces a legal or similarly significant effect on you (for example, an automated decision to decline onboarding or block a transaction with no human review) we will tell you here. We will include information on the logic involved, and its significance and likely consequences for you. You will also be told how to ask for the decision to be reviewed by a person, and how to express your point of view.

If no such solely-automated, significant effect processing currently takes place, this section will confirm that instead, and will be updated if that changes.

MARKETING

We may use your identity, contact, technical, usage and profile data to work out what products, services, or offers may interest you. You will receive marketing communications from us if you have requested information from us or, you are a Merchant or a Consumer, or purchased services from us and, in each case, you have not opted out of receiving that marketing.

We will always obtain your express opt-in consent before sharing your data with third parties for their own marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at hello@wonderful.co.uk at any time.

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.

We may process your personal data without your knowledge or consent, in compliance with the rules above, where this is required or permitted by law. For example, in connection with AML or sanctions obligations.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above. We may share this data with:

1. Service providers acting as processors, based in the UK, EEA and USA, who provide IT, hosting, and system administration services.
2. Professional advisors acting as processors or joint controllers such as lawyers, auditors, and insurers.
3. Sanctions, PEP and fraud-screening providers, and credit reference agencies, engaged for onboarding and ongoing due diligence.
4. HMRC, the FCA, other regulators and law enforcement, where reporting or disclosure is required.
5. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. If this happens, the new owner may only use your data as set out in this notice. Alternatively, we may seek to acquire other businesses or merge with them.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Some of our external third parties are based in locations outside of the UK and the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data to locations outside of the UK and the EEA.

Whenever we transfer your personal data to locations outside of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Information Commissioner or, where appropriate, the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
2. Appropriate and adequate safeguards have been provided in relation to such transfers, including for example, adoption of Standard Contractual Clauses approved

by the European Commission in our contract with the party importing the personal data. For further details, see [European Commission: Standard Contractual Clauses](#) .

Please *Contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and EEA.

7. DATA SECURITY

We have put in place appropriate security and technical measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions.

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.

8. DATA RETENTION

FOR HOW LONG WILL YOU USE MY PERSONAL DATA?

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five years after they cease being customers for regulatory and financial purposes. If you do not use the App for a period of five years, then we will treat the account as expired, and your personal data will be deleted according to our data retention policy. In certain circumstances, we may be required to keep customer data for longer, for example, at a regulator's request, or for ongoing legal proceedings).

We retain:

- General account and transaction records - for at least 5 years from the end of the business relationship, for tax, accounting and dispute resolution purposes.
- Marketing and communications preference data - until you opt-out or ask us to delete it, or after a period of inactivity, whichever is sooner.
- Technical and usage data used for analytics – for a shorter period, in line with our Cookie Policy.

In some cases we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

In some circumstances you can ask us to delete your data: see below for further information.

9. YOUR LEGAL RIGHTS

Under data protection laws in relation to your personal data, you have the right to:

1. Request access to your data (a 'Subject Access Request').

2. Request correction of inaccurate or incomplete data.
3. Request erasure of your data, where there is no adequate or lawful reason for us to keep processing it.
4. Object to our processing based on legitimate interests, or to direct marketing at any time.
5. Request restriction of processing of your personal data in specified circumstances.
6. Request transfer of your personal data to you or a third party, where technically feasible.
7. Withdraw consent at any time (where we rely on consent this will not affect processing carried out before withdrawal).

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Contact our DPO using the details provided in this notice to exercise any of these rights, or to complain. You can also complain to the ICO, and, for regulated payment services, to the Financial Ombudsman Service (FOS).

10. GLOSSARY

Legitimate Interest means the interest of our business 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 interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

1. Service providers acting as processors based in the UK and EEA and the United States of America who provide IT and system administration services.
2. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers based in the UK and EEA who provide consultancy, banking, legal, insurance and accounting services.
3. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
4. We have published a comprehensive list and notice of our third-party application providers and related sub-processors on our Website at wonderful.co.uk which is kept up to date regularly. This notice includes further privacy information about how we process personal data through such providers.

Further information about your rights can be found at the ICO Website:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>