

Toucan Data Protection Policy

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1. About this document

This is the data protection policy ("Data Protection Policy") for information collected by Toucan App Ltd, known as Toucan, and <https://usetoucan.com> ("Website"). The Website is operated by or on behalf of Toucan.

At Toucan, we want to be clear and transparent about the information we collect, how we use the information, where we store the data and how it is protected.

This Data Protection Policy explains:

- Who we are and what we do
- What information we collect and why we collect it

- How we use that information
- The choices we offer, including how to access and update information

We've tried to keep this Data Protection Policy as simple as possible but if you have any questions, please contact us at info@usetoucan.com.

2. Who are Toucan?

We are Toucan App Ltd, a limited company registered in the UK with company number 11514165. We are building a financial forecast app to help people overcome anxiety around dealing with their finances.

Our registered address is Flat 18, Gloucester Court, Swan Street, London, SE1 1DQ.

3. What information do we collect?

We collect information to:

- Conduct research into how people interact with their finances, their mental health and our app
- Send emails to our mailing list
- Analyse information about visitors to the Website (usetoucan.com)
- Provide financial forecast features through our app

3.1. Conducting research

We conduct research regularly into how people interact with their personal finances and how that interaction impacts their mental health. We also conduct research into what people think about the design of our app.

These research projects usually involve speaking to or spending time with research participants either face-to-face or remotely. The types and format of information that we capture vary from project to project but may involve sound recording or photography. All participants are required to sign a consent form that informs them about the specifics of the project. This form covers what, if anything, will be recorded, and how participant data is to be used and shared.

Participant data will be securely handled and subsequently disposed of in an appropriate period of time.

3.2. Sending emails to our mailing list

We collect email addresses on the Website (usetoucan.com) for the purpose of sending marketing emails and email newsletters to our mailing list. These emails are given with consent. Every email that we send will include a link to unsubscribe.

3.3. Analysing information about visitors to our Website

We may collect information about the parts of the Website that you use and how you use it. This information includes:

3.3.1. Device information

We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).

3.3.2. Log information

When you use our Website, we may automatically collect and store certain information in server logs. This may include:

- Details of how you used our Website
- Internet protocol address
- Device event information, such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL
- Cookies that may uniquely identify your browser

3.3.3. Local storage

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

3.3.4 Cookies and similar technologies

We may use various technologies to collect and store information when you visit our Website, and this may include using cookies or similar technologies to identify your browser or device. You may set your browser to block all cookies, including cookies associated with this Website or to indicate when a cookie is being set by us.

3.4. Providing app features

We collect information for people who use the Toucan app in order to provide financial forecast features for them. Personal information will be collected with express consent to register a new Toucan account.

Data from people using the app will be securely handled and disposed of if requested.

4. How does Toucan use your data?

We use personal information to manage and operate our business, including to conduct research, send emails and provide app features. Where necessary, we may also use personal information to protect the interests of Toucan, our employees and affiliates (for example, in the event of a legal claim).

When you contact us, we keep a record of your communication to help us remember who we've spoken to and why. We may use your email address to inform you about our business, such as letting you know about upcoming events or changes to our business.

We use the information we collect from our Website to provide, maintain, protect and improve it and to protect the people who use it. We may use information collected from cookies and other technologies to improve your user experience and the overall quality of our Website.

4.1. Our legal basis for processing your personal information

If EU data protection law applies to our processing of your personal information, it is important that you know the lawful basis on which we process your personal information. We rely on the following legal basis, under EU data protection law, to process your personal data:

- Where we have obtained your consent (for example, to participate in our research activities). You can withdraw your consent at any time, but we may still need to retain a record of your correspondence with us.
- Where it is necessary to comply with a legal obligation (for example, under anti-money laundering or anti-bribery legislation).

4.2. Will we transfer personal information?

Toucan is headquartered in the UK, but may use suppliers or offer services around the world. Consequently, information we collect may be transferred to, and stored in, the US and other countries where the data protection laws may offer a lower standard of protection than in your country of residence. Where personal information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that it is subject to appropriate safeguards and that it is treated securely and in accordance with this Data Protection Policy.

4.3. Will we share your information?

We share personal information with companies, organisations and individuals outside of Toucan in the following circumstances:

4.3.1. With your consent

We may share personal information with companies, organisations or individuals outside Toucan when we have your consent to do so.

4.3.2. For external processing

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, for example using a transcription service, based on our instructions and in compliance with our Data Protection Policy and any other appropriate confidentiality and security measures.

4.3.3. For legal reasons

We may share personal information with companies, organisations or individuals outside Toucan if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request
- enforce applicable terms of service, including investigation of potential violations
- detect, prevent or otherwise address fraud, security or technical issues
- protect against harm to the rights, property or safety of Toucan, our users or the public as required or permitted by law

5. How will we keep your information secure?

We work hard to protect our Website, app and any information that we hold from unauthorized access or unauthorized alteration, disclosure or destruction.

In particular:

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Toucan employees, contractors, service providers and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

6. What are your rights?

If you are resident in the European Economic Area and/or your personal information is processed in the context of our UK office, you have certain legal rights in respect of the personal information about you held by us. This includes the right to obtain a copy of this information on request, and the right to correct, amend or delete such personal information or object to it being used for certain purposes (including marketing). We may ask you to verify your identity before we can act on your request.

We will comply with any requests to exercise your rights in accordance with applicable law, and so there may be circumstances where we are entitled to refuse your request. For example, where permitted to by law, we may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so free of charge, except where it would require a disproportionate effort (where we are permitted to charge a fee under applicable law). We aim to maintain any information we hold and our Site in a manner that protects information from accidental or malicious destruction.

To make any requests regarding your personal information, or if you have any questions or concerns regarding your personal information, you should contact us using the details below.

You are also entitled to contact your local supervisory authority for data protection. In the UK, the data protection authority is the Information Commissioner's Office.

7. When does this Data Protection Policy apply?

Our Data Protection Policy applies to all of the services offered and businesses operated by Toucan, but excludes services and businesses that have separate privacy policies that do not incorporate this Data Protection Policy.

Our Data Protection Policy does not apply to services offered or businesses operated by other companies or individuals. Our Data Protection Policy does not cover the information practices of other companies and organisations that advertise our services and that may use cookies, pixel tags and other technologies.

7.1. Will this Data Protection Policy change?

Our Data Protection Policy may change from time to time. We will post any Data Protection Policy changes on this page and, if deemed necessary, we will provide a more prominent notice.

8. How can you find out more?

Please submit any questions, concerns or comments you have about this Data Protection Policy or any requests concerning your personal information by email to info@usetoucan.com.

For the purposes of EU data protection law, Toucan App Ltd is the data processor and/or controller.