

Privacy Notice

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We recommend that you read this Privacy Notice in full to ensure you are completely informed about your personal data. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link above to jump to that section.

Luna Protocol Limited ("**Luna**", "**we**", "**our**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal data about you and how you can exercise your privacy rights. This Privacy Notice only applies to personal data that we collect through our website at <https://www.luna-protocol.com/> ("**Website**"). Luna Protocol Limited is the controller of the data.

We may also act as a processor of personal data for other controllers that use our platform. Please consult their privacy notice for information about your privacy rights.

If you have any questions or concerns about our use of your personal data, then please contact us using the contact details under the "[How to contact us](#)" heading below.

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1. What does Luna do?

Luna enables financial institutions to build and offer dynamic and tailored financial products to their customers. We are headquartered in the United Kingdom and are part of the Motive Group <https://www.motivepartners.com/>

For more information about Luna, please see the “About Us” section of our Website at <https://www.luna-protocol.com/about-us>

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2. Personal data we collect and process

a) The personal data we collect from you, either directly or indirectly, will depend on how you interact with us and with our Website. We collect personal data about you from the following different sources:

- **Information that you provide directly**

We collect personal data directly from you when you choose to provide us with this information online. Certain parts of our Website ask you to provide personal data when you use the contact us web form.

- **Information that we collect indirectly**

We collect your personal data indirectly, including through automated means from your device when you use our Website. Some of the information we collect indirectly is captured using cookies and other similar technologies, as explained further in the ["Cookies and similar technology"](#) section below.

b) The table below describes the categories of personal data we collect from and about you through our online services and activities on our Website.

Personal Data Description	Source
Identity and Contact Data such as your name, email address and contact number. We may also collect information on the organisation you are employed by and your job role.	<ul style="list-style-type: none"> • Directly from you
Communications Data such as your query or message that you send via our contact us form or other messages you send to us via other means.	<ul style="list-style-type: none"> • Directly from you
Marketing Data such as your preferences in relation to receiving marketing materials from us, and communication preferences.	<ul style="list-style-type: none"> • Directly from you
Device Data collected using tags and pixels, including your IP address, your ISP, and the browser you use to visit our Website, device type, unique device identification numbers or other identifiers.	<ul style="list-style-type: none"> • Automatic collection

We do not collect any sensitive personal data about you, such as health-related information or information about your race or ethnicity, or sexual orientation.

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3. **How we use your personal data (our purposes) and our legal basis for processing it**

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** - we require certain personal data in order to provide the goods and support the services you purchase or request from us;
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate interests** – we will use or disclose your personal data for the legitimate business interests of either Luna or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business, including our Website; communicate with you and respond to your questions; improve our Website and promote our products and services; and/or to manage the security of our IT infrastructure. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our organisation and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are; or
- **Legal obligation** – there be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.

The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

Purpose/Activity	Type of personal data	Lawful basis for processing including basis of legitimate interest
Respond to your communications and queries.	Identity and Contact Data Communication Data	<ul style="list-style-type: none"> • Performance of a contract with you. • Otherwise, as necessary for our legitimate interests (to communicate with you) – where our communications are not necessary to perform or enter into a contract with you.
Reviewing communications with you for customer support and quality assurance and training purposes, and related recordkeeping.	Identity and Contact Data Communications Data	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to operate, provide and improve our business; to communicate with you) – where our communications are not necessary to perform or enter into a contract with you.
Keep our Website secure. For example, online we use malware and spyware monitoring tools to detect suspicious activity.	Device Data	<ul style="list-style-type: none"> • Necessary for our and our third parties' legitimate interests (to protect our Website and to manage the security of our Website).
Manage compliance with our Website terms.	Identity and Contact Data Communication Data Device Data	<ul style="list-style-type: none"> • As necessary for our legitimate interests (to protect our business and our Website).
To administer and maintain our Website and our IT systems (including monitoring, troubleshooting, data analysis, testing, system maintenance, repair and support, reporting and hosting of data).	Device Data	<ul style="list-style-type: none"> • Our and our third parties' legitimate interests (to operate, provide and improve our Website and manage the security of our Website).

Manage our use of Cookies (including enabling you to manage your cookie preferences, where we make this available).	Device Data	<ul style="list-style-type: none"> • Consent (where required under applicable law – see cookie consent notice https://www.luna-protocol.com/cookie-policy on our website). • Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our Website.
Contact you about our products and services, promotions, and events we think may be of interest, including our newsletter and other promotional mailers and electronic communications.	Identity and Contact Data Marketing Data	<ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise our legitimate interests (to communicate with you and promote our products and services).
Comply with legal and regulatory obligations to which we are subject, including our obligations to respond to your requests under data protection law.	Identity and Contact Data Communication Data	<ul style="list-style-type: none"> • Legal obligation
Protect our legal rights (including where necessary, to share information with law enforcement and others), for example to defend claims against us and to conduct litigation to defend our interests.	Identity and Contact Data Communication Data	<ul style="list-style-type: none"> • Our legitimate interests to protect our business interests.

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4. Who we share your personal data with

We share your personal data with the following categories of recipients:

- **our group companies** <https://www.motivepartners.com/>, who provide data processing services necessary to provide you with our goods and services (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal data for purposes described in this Privacy Notice.
- **third party service providers and partners** who provide data processing services to us as necessary to support the delivery of, provide functionality on, or help to enhance the security of our Website, or who otherwise process personal data for purposes described in this Privacy Notice. For example, we use a Website Hosting Provider for the provision of our website. For more information please contact us.
- **third party services** when you use third party services linked through our Website, your personal data will be collected by the provider of such services. Please note that when you use third party services, their own terms and privacy notices will govern your use of their services;
- any **competent law enforcement body, regulatory, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- a **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice; or
- any **other person with your consent** to the disclosure (obtained separately from any contract between us).

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5. Cookies and similar technology

We use cookies and similar technology (collectively, “**Cookies**”) to collect and use personal data about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice: <https://www.luna-protocol.com/cookie-policy>

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6. How we keep your personal data secure

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures are designed to provide a level of security appropriate to the risk of processing. Specific measures we use include encrypting your personal data in transit and at rest; employing advance malware protections; blocking use of removal media and implementation of other reasonable security defences (including vulnerability management, access management and recovery/resilience measures).

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7. International data transfers

In some cases, where your personal data is transferred to another Luna group company or third parties, it is processed in countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our Website servers are located in the US, and our group company Motive is located in the U.S. Our third party service providers and partners operate around the world. This means that when we collect your personal data we may process it in any of these countries.

Where we transfer your personal data to countries and territories outside of the European Economic Area and the UK, we will ensure that your personal data remains protected in accordance with this Privacy Notice.

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8. Data retention

We retain the personal data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need or legal reason to process your personal data, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

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9. Your data protection rights

Individuals located in the UK and EEA have the following data protection rights. To exercise any of them see specific instructions below or contact us using the contact details provided under the [“How to contact us”](#) heading below.

- You may **access, correct, update or request deletion** of your personal data.
- You can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data, (i.e. your data to be transferred in a readable and standardised format).
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the [“How to contact us”](#) heading below. If you choose to opt out of marketing communications, we will still send you non-promotional emails, such as emails about our ongoing business relations (where applicable).
- If we have collected and processed your personal data with your consent, then you can **withdraw your consent** at any time by using the contact details provided under the [“How to contact us”](#) heading below. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a supervisory authority** about our collection and use of your personal data. For more information, please contact your local supervisory authority. Contact details for supervisory authorities in Europe are available [here](#) and for the UK [here](#). Certain supervisory authorities may require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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10. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

We will obtain your consent to any material Privacy Notice changes if, and where, required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

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11. How to contact us

If you have any questions or concerns about our use of your personal data, please contact us using the following details: hello@luna-protocol.com.

The data controller of your personal data is Luna Protocol Limited