

Privacy policy

Who are we?

scudi is a fast-growing fintech and enables employees to have access to a portion of their already earned salary before their wages are paid by the employer. scudi provides our own-label and white-label digital corporate employer services. scudi provides complete end-to-end solutions for customers by designing, developing, implementing, and managing such solutions.

Contacting Us

If you have questions about this policy, please feel free to contact us at:

info@scudi.me

Data Controller

SCUDI BV, CordaIncubator Kempische Steenweg 303, bus 200, 3500 Hasselt, Belgium.

What data does scudi collect and why?

It is important that you know exactly what we do with the personal information you make available to us, why we collect it and what it means for you. This document outlines scudi's approach to Data Privacy to fulfil our obligations under the EU General Data Protection Regulation (GDPR) 2018.

The personal data we normally collect from you is:

First Name and Surname, Date of birth, Email address, Address, Bank Account details, telephone number, transactional information and other personal information such as security questions and user ID

The personal data we collect will be used for the following purposes:

For processing your account information;

To comply with our legal and regulatory obligations to prevent misuse, fraud, money laundering and to counter terrorist financing;

To verify your identity;

To contact you regarding our service to you;
If we are requested by law enforcement.

Our legal basis for processing the personal data:

We shall use the information you provide to us on the following basis

Upon receipt of your consent, to enable the performance of a contract where you are a party;
To meet our legal obligations and to comply with the appropriate laws.

Any legitimate interests pursued by us, or third parties we use, are as follows:

To enable us to comply to the regulations and law designed to prevent fraud, money laundering, counter terrorist financing or misuse of services.

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified above. We will always tell you why and how the information will be used.

Withdrawal of Consent Conditions

You may withdraw consent from direct marketing at any time by contacting our Data Protection Officer. Please note, where you have consented to your data being used for carrying out financial transactions, then the right to withdraw consent does not exist. scudi is obliged to retain data concerning financial transactions for 6 years in accordance with the legislation for the purpose of preventing, detecting, and investigating possible money laundering or terrorist financing.

International Data Transfers & Third-Party Disclosures

In limited situations where scudi stores or transfers personal information outside the EEA or the EU, robust procedures and safeguarding measures are applied to secure, encrypt and maintain the integrity of the data. scudi will complete continual reviews of the countries with sufficient adequacy decisions, such as the Privacy Shield in the US, and provisions for binding corporate rules, standard data protection clauses or approved codes of conduct. scudi will perform appropriate due diligence checks with recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information. SCUDI operates in compliance with Article 46 of the GDPR, and

shall not transfer data outside of the EEA or EU unless the following conditions are fulfilled:

The data subject has enforceable rights and effective legal remedies

Adequate levels of protection to any Personal Data that is transferred (or, if it is not so bound, uses its best endeavours to assist the Customer in meeting its obligations);

Reasonable instructions are notified to it in advance with respect to the processing of the Personal Data; and

When notified, shall delete or return Personal Data (and any copies of it) unless SCUDI is required by Law to retain the Personal Data.

Where scudi is required to transfer Personal Data to the United States of America, scudi shall only send such Personal Data to third-party sub-contractors that meet the minimum requirements contained under the Privacy Shield, or in the standard contractual clauses for the transfer of personal data to processors established in third countries under Directive 95/46/EC of the European Parliament.

In the event that the Privacy Shield is repealed at any future date, for whatever reason, scudi shall only contract with third-party sub-contractors that satisfy the requirements contained in the standard contractual clauses for the transfer of personal data.

Retention Period

scudi may process personal data for the duration of the contract for services and will store the personal data for six (6) years after termination of the contract.

Your Rights as a Data Subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

Right of access – you have the right to request a copy of the information that we hold about you;
Right of rectification – you have a right to correct data that we hold about you that is inaccurate or

incomplete;

Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Your data relating to financial transactions, accounts or cards cannot be deleted due to legislation associated with the prevention of fraud, money laundering, counter terrorist financing or misuse of services for crime;

Right to restriction of processing – where certain conditions apply to have a right to restrict the processing;

Right of portability – you have the right to have the data we hold about you transferred to another organisation;

Right to object – you have the right to object to certain types of processing such as direct marketing;
Right to object to automated processing, including profiling – you also have the right to be subject to

the legal effects of automated processing or profiling; and

Right to judicial review, in the event that scudi refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined above.