

Topa — Privacy Policy

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This Privacy Policy explains how ClicknShare Ltd collects, uses, shares and protects your personal information when you use Topa — the Topa app, the website topa.click, our webchat and any related services (together, “Topa” or the “Service”). It also explains your rights. Please read it together with our Terms of Use.

1. Who is responsible for your information

1.1. The data controller is **ClicknShare Ltd**, company number 16166273, 9 Journey Campus, Castle Park, Cambridge CB3 0AX, United Kingdom (“ClicknShare”, “we”, “us”). Topa is part of the ClicknPay family of products.

1.2. ClicknShare is registered with the UK Information Commissioner’s Office (ICO) [registration number: ZC043420]. Questions about this Policy or your data can be sent to our data protection contact at admin@clicknshare.online, or by post to the address above, marked “Data Protection”.

1.3. **Money transfers.** When you use Topa to send money, the transfer is executed by our Money Transfer Partners, ClicknPay Limited (company number 14105825) and Transfa Pay Ltd (company number 12140801, FCA Firm Reference Number 944767). For that service they act as independent controllers of the information needed to execute and report the transfer, under their own privacy policies (ClicknPay: <https://clicknpay.co.uk/#/terms>). We share your information with them as described in section 5.

2. Information we collect

We collect the following categories of information.

2.1. **Identity and contact details** — name, date of birth, email address, phone number, residential address, nationality, and username.

2.2. **Identity verification (KYC) information** — copies of identity documents (passport, driving licence, national ID), proof of address, a selfie or short video, biometric data derived from your document and selfie for matching purposes, and the results of verification, sanctions, politically-exposed-person (PEP) and fraud checks. Verification is carried out with our identity-verification provider (currently Veriff) and by checking your information against third-party databases.

2.3. **Recipient and beneficiary details** — the name, phone number, meter or account number, student or reference number, address, bank or mobile-wallet details of the people and Providers you pay or send money to. If you give us information about another person, you confirm that you are entitled to do so and that they understand it will be used to deliver the payment.

2.4. Transaction and payment information — the services you pay for, amounts, currencies, exchange rates, fees, stated purpose, timestamps, status, receipts and tokens, payment method details (card type, last four digits, expiry; full card numbers are handled by our Payment Processors, not stored by us), bank account details where provided, and your transaction history.

2.5. Account and usage information — login history, device identifiers, IP address, operating system, app version, browser type, language, time zone, pages and screens viewed, crash reports and diagnostics, and your in-app preferences (such as saved beneficiaries and reminders).

2.6. Communications — messages you exchange with us by webchat, email, phone or social media, and records of support requests (our webchat is provided by Intercom).

2.7. Marketing preferences — whether you have opted in or out of marketing, and how you interact with our emails and notifications.

2.8. Information from third parties — identity-verification, fraud-prevention and sanctions-screening providers; our Payment Processors (for example Stripe) and Money Transfer Partners; payout partners and Providers (for example confirmation that a token was issued or a bill paid); credit reference agencies used solely to confirm identity (no credit check is performed and your credit score is not affected); public sources; and app stores.

2.9. We do not knowingly collect information from anyone under 18. Topa is not intended for minors.

3. How we use your information and our lawful bases

We use your information for the purposes below. UK data protection law requires us to have a lawful basis for each purpose.

Purpose	Lawful basis
Creating and managing your Account, processing your Orders, delivering tokens, vouchers and confirmations, and providing customer support	Performance of our contract with you
Verifying your identity, screening against sanctions and PEP lists, monitoring transactions and reporting suspicious activity	Legal obligation (UK anti-money-laundering, counter-terrorist-financing and sanctions law); public interest
Explicit processing of your personal data to provide payment services	Your explicit consent, as required by the Payment Services Regulations 2017 (you may withdraw it, but we will then be unable to provide the Service)
Detecting and preventing fraud, protecting the security of the Service and our users	Legitimate interests (preventing crime and protecting users) and legal obligation

Sending service messages — receipts, delivery status, security alerts, changes to terms	Performance of our contract; legal obligation
Improving Topa, analysing usage, fixing errors and developing new features	Legitimate interests (running and improving our business)
Sending you marketing about Topa and ClicknPay family products	Consent (or legitimate interests for existing customers, with an opt-out in every message)
Responding to complaints, disputes and legal claims, and keeping records	Legal obligation; legitimate interests
Complying with requests from regulators, courts, law enforcement and tax authorities	Legal obligation

We may use automated decision-making, including profiling, for identity verification, fraud detection and transaction monitoring. Where an automated decision has a significant effect on you (for example a declined verification), you can ask for a manual review by contacting us.

4. Marketing

You can opt out of marketing at any time using the link in any email, the notification settings in the App, or by contacting us. We will still send you service and security messages. We do not sell your personal information.

5. Who we share your information with

We share your information only where necessary, and only with parties that are bound to protect it.

5.1. Money Transfer Partners — ClicknPay Limited and Transfa Pay Ltd, to execute, screen, report and settle money transfers you request.

5.2. Payment Processors — such as Stripe and the ClicknPay OpenAPI gateway, to collect your payment and process refunds.

5.3. Identity-verification, fraud-prevention and screening providers — such as Veriff, and sanctions/PEP screening and fraud-prevention databases.

5.4. Payout partners and Providers — the utilities, councils, schools, telecoms operators, retailers, insurers, property developers, mobile-money operators, banks and cash-payout agents (including ClickaCash and ClickEasy within the ClicknPay family, and airtime aggregators such as Ding) that fulfil your Order. They receive the Recipient reference, the amount and, where needed for delivery or receipts, the Recipient's and your name and phone number.

5.5. ClicknPay family companies — ClicknPay Limited, ClickaCash and ClickEasy, for account administration, settlement, support and (with your consent) marketing.

5.6. Service providers — cloud hosting, SMS and email delivery, customer-support tools (Intercom), analytics, app-store platforms and professional advisers, under contracts that restrict their use of your information to providing services to us.

5.7. Regulators, law enforcement and authorities — including the Financial Conduct Authority, the National Crime Agency, HMRC, courts and the Financial Ombudsman Service, where required by law or to respond to a lawful request.

5.8. Business transfers — if we sell, merge or restructure our business, your information may be transferred to the new owner, who will be bound by this Policy.

6. International transfers

Topa connects the UK with Zimbabwe and other countries. To deliver your payments, your information (and your Recipient's) is transferred to Providers, payout partners and partners in the destination country, and some of our service providers process data outside the UK. Where a country has not been recognised by the UK as providing adequate protection, we use safeguards such as the UK International Data Transfer Agreement or Addendum, contractual protections, and data-minimisation (sending only what is needed to complete the payment). You can ask us for more information about these safeguards.

7. How long we keep your information

7.1. We keep your information for as long as you have an Account and afterwards for as long as necessary to meet legal, regulatory, tax and audit obligations, resolve disputes and enforce our agreements.

7.2. In particular, UK anti-money-laundering rules require us and our partners to keep identity-verification records and transaction records for **five years** after the end of our relationship with you or after the transaction, whichever is later. Marketing preferences are kept until you opt out and then as a suppression record. Usage analytics are kept in aggregated or pseudonymised form.

7.3. When you close your Account we delete or anonymise information we no longer need, and archive the rest for the retention periods above with access restricted to compliance purposes.

8. Security

We protect your information with encryption in transit and at rest, access controls, multi-factor authentication for staff and partner access, monitoring, and regular testing. Card numbers are handled by PCI-DSS-compliant Payment Processors and are not stored by us. No system is completely secure; keep your login details, PIN and device safe and tell us immediately if you suspect misuse.

9. Cookies and similar technologies

9.1. [topa.click](#) and the App use cookies, local storage and similar technologies for: **essential** purposes (keeping you logged in, security, remembering your settings and country); **analytics** (understanding how the site and App are used, in aggregated form); and **support** (the Intercom webchat, which sets cookies to keep your conversation open).

9.2. You can control cookies through your browser settings and, where we show a cookie banner, through your choices there. Blocking essential cookies may stop parts of the Service working. We do not currently use third-party advertising cookies on [topa.click](#).

10. Your rights

Under UK data protection law you have the right to:

- **access** the personal information we hold about you;
- **correct** inaccurate or incomplete information (verified identity details can only be changed after re-verification);
- **delete** your information in certain circumstances (we must keep records required by anti-money-laundering law for the periods in section 7);
- **restrict** or **object** to certain processing, including direct marketing;
- **data portability** — receive information you provided to us in a machine-readable format;
- **withdraw consent** where processing is based on consent, without affecting processing already carried out; and
- **not be subject to a solely automated decision** with legal or similarly significant effects — you can request human review.

To exercise any right, contact admin@clicknshare.online or use the in-app support chat. We may need to verify your identity first. We will respond within one month (extendable by two months for complex requests). There is no fee unless a request is manifestly unfounded or excessive.

You also have the right to complain to the Information Commissioner's Office: ico.org.uk, telephone 0303 123 1113, Wycliffe House, Water Lane, Wilmslow SK9 5AF. We would appreciate the chance to resolve your concern first.

11. Children

Topa is for adults aged 18 and over. We do not knowingly collect personal information from children. If you believe a child has provided us with information, contact us and we will delete it.

12. Third-party links and services

[topa.click](#) and the App link to third-party websites and services, including Providers, the ClicknPay marketplace (clicknpay.com), ClicknShare (clicknshare.co.uk) and app stores.

Those services have their own privacy policies and we are not responsible for their practices.

13. Changes to this Policy

We may update this Policy from time to time. The current version is always available at topa.click/privacy-policy and in the App. If we make a material change to how we use your information we will notify you by email or in the App at least 30 days before it takes effect, where reasonably possible.

14. Contact us

ClicknShare Ltd · 9 Journey Campus, Castle Park, Cambridge CB3 0AX, United Kingdom
Email: admin@clicknshare.online (data protection) · support@clicknpay.co.uk (Topa support) Phone: +44 1223 482272 · Webchat: topa.click and in the App