iMobile

MoneyCounter

Country Annex — United Kingdom

Vendor statement of facts relevant to local requirements

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Contents

1. Purpose and status . . . 3
2. Product facts . . . 3
2.1. Personal data the product can process . . . 3
2.2. Where data is stored . . . 3
2.3. Data sent to the vendor . . . 3
3. Data protection — UK GDPR . . . 4
3.1. Roles . . . 4
3.2. What the product provides . . . 4
3.3. What remains with the customer . . . 4
4. Supplier security . . . 4
5. Accessibility . . . 5
6. Language . . . 5
7. Documents usually requested and where to find them . . . 5

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About this document

This annex supplements the documentation of MoneyCounter version 2.0.0.0 for customers in the United Kingdom. It sets out the facts about the product that matter under the local rules named below and shows which obligations stay with the customer.

The annex is a statement by the vendor about its product. It is not legal advice, not a certificate of conformity and not a substitute for the customer's own assessment.

1. Purpose and status

No certification under United Kingdom schemes (including Cyber Essentials) and no registration with United Kingdom authorities is claimed for the product or for the vendor in this document.

2. Product facts

Item	Fact
Product and version	MoneyCounter 2.0.0.0
Deployment	Desktop software installed on the customer's computers
Customer content on vendor servers	No
Interface languages	16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only.

2.1. Personal data the product can process

- The e-mail address entered to activate the Pro edition: kept on the computer in an encrypted file and sent to the vendor's account server. Not requested without activation.
- A machine fingerprint (SHA-256 hash of the Windows MachineGuid, the computer name and the system volume serial number): sent to the account server after activation and tied to the e-mail address in the signed terms string.
- Free-text comments to counts typed by the user: kept only in the local database.

2.2. Where data is stored

All data stays on the user's computer, in the Windows user profile: the database `%APPDATA%\MoneyCounter\moneycounter.ste` (SQLite: currencies, denominations, history of counts with logs), the activation file `%APPDATA%\MoneyCounter\license.dat`, and settings in the registry key `HKCU\Software\MoneyCounter` (language, selected currency, history column layout). No count data is stored on vendor servers.

2.3. Data sent to the vendor

- Activation code request: e-mail address, product identifier, interface language code (HTTPS, account server `accounts.new-imobile.com`)
- Activation: e-mail address, code from the e-mail, product identifier
- Edition check — right after activation and in the background on every start of an activated program: activation token, product identifier, machine fingerprint

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- Nothing else: no counts, history, telemetry or error reports are sent and there is no update check; a program that has not been activated opens no network connections

3. Data protection — UK GDPR

The UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, apply to the personal data the customer processes with the product. The supervisory authority is the Information Commissioner's Office (ICO).

3.1. Roles

For personal data processed in the product on the customer's own equipment, the customer is the controller. The vendor has no access to that data and is not a processor for it.

For the data listed under "Data sent to the vendor", which the vendor receives in order to perform the licence agreement, the vendor is itself a controller.

Details of the vendor's establishment and, where Article 27 UK GDPR applies, of its United Kingdom representative are stated in the contract.

3.2. What the product provides

- **Access control.** The program has no sign-in, roles or access control of its own. Access to data is determined by the Windows account: each Windows user has a separate database and activation. The Pro edition is confirmed by an e-mail address and a one-time code sent to it.
- **Logging.** The program keeps no security event log, operation log or diagnostic files. Each saved count is stored with its log: lines about quantity changes, clearing and saving with the breakdown by denomination. The user can delete history records; deletions are not recorded.
- **Export and deletion.** Export: File → Back up… saves a copy of the database — a SQLite file readable with standard tools; there is no export to CSV, Excel or PDF and no printing. Deletion: a single history record with the M- button; all user data by deleting the folder `%APPDATA%\MoneyCounter` and the registry key `HKCU\Software\MoneyCounter` (uninstalling the program does not remove them). Activation data on the account server cannot be deleted from the program — contact iMobile for that.
- **Encryption.** See the section on cryptography below.

3.3. What remains with the customer

- the lawful basis for processing and privacy information to individuals;
- records of processing and, where required, a data protection impact assessment;
- answering individuals' requests with the export and deletion functions above;
- reporting a personal-data breach to the ICO within 72 hours where the law requires it.

4. Supplier security

Central-government buyers require suppliers to hold Cyber Essentials certification for many contracts, and assess cloud services against the NCSC Cloud Security Principles. The facts needed for a supplier assessment are in the Security and Data Protection Statement. No Cyber Essentials certificate is claimed in this document.

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5. Accessibility

Public-sector bodies must meet the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, which point to WCAG 2.2 Level AA; all buyers are subject to the Equality Act 2010.

Status of the product: No accessibility evaluation has been carried out; operation with screen readers and in high-contrast mode has not been tested. The display and some buttons are non-standard, custom-drawn controls. For Arabic and Persian the main window keeps a left-to-right layout.

No WCAG conformance report is provided for this version.

6. Language

This package is supplied in English. English is the language of contracts and documentation in the United Kingdom; no further language version is needed.

Interface languages of the product: 16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only.

7. Documents usually requested and where to find them

Usually requested	Where it is
Product description, functional specification	Product Description and Functional Specification
Installation and operating instructions	Installation and Administration Guide
User manual	User Guide
Maintenance and support description	Software Lifecycle, Maintenance and Support. Service levels: contract
List of third-party and open-source components	Delivery Specification and Third-Party Components
Security and data-protection description	Security and Data Protection Statement
Processing contract (Article 28 UK GDPR), transfer agreement	Contract; needed only where the vendor processes customer data
Cyber Essentials certificate	Not claimed
WCAG 2.2 accessibility statement	Not provided for this version
Licence agreement, warranties, prices	Contract

Document history

Document version	Date	Product version	Change
1.0	2026-10-06	2.0.0.0	First issue

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