



Transact Payments Limited: Privacy Policy

This privacy policy sets out details of how we may process your personal data and was updated on 7 June 2017.

This policy (together with our terms of use relating to any Card or payment service products you purchase) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

When we collect your data

We collect your data whenever you provide information to us by e.g. applying for and using our services or contacting us. By “your data”, “your personal data”, and “your information”, we mean any information about you, which you or third parties provide to us. You agree that the data you supply to us will be true, complete and accurate in all respects, and that you will notify us immediately of any changes to that information.

What type of data do we collect?

The type of data we collect about you may include:

- your contact information (e.g. name, address, phone number, email, billing or mailing address);
- your date of birth;
- usernames and passwords;
- your identity validation (e.g. passport and driving licence copies and details);
- information that you provide by filling in forms on our site or applications to use our services;
- records of any correspondence when you contact us;
- details of transactions you carry out through our website or via use of our services and of the fulfilment of your transaction requests;
- details of your visits to our website including the resources that you access and your IP address; and
- confidential details about any matter on which you choose to engage us, as well as your bank account and/or other payment details for the purpose of paying our charges.

Where you provide personal and financial information relating to third parties (e.g. dependants, joint account holders) for the purpose of opening or administering your account you confirm that you have their consent or are otherwise entitled to provide this information to us in accordance with this policy.

Identity of the Data Controller

When you provide personal information in your Card application, Transact Payments Limited with address at 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA (“TPL”) will be the Data Controller for the purposes of the Data Protection Act 2004. If another company is the Data Controller, this will be made clear when you provide your personal information.

How we use your data

TPL and its Group may use your information:

- to validate your identity;
- to provide payment services to you and manage your account(s);

- to deal with your enquires and requests;
- for assessment and analysis purposes (including credit and/or behaviour scoring, market and product analysis and market research);
- to prevent and detect fraud, money laundering and any other criminal activity;
- to comply with applicable laws, regulations, court orders, government and law enforcement agencies' requests, to operate our systems properly or to protect ourselves or our users and customers or to solve any customer disputes;
- to develop and improve our services to you; and
- to offer products and services to you that you request from us or which we feel may interest you, where you have not objected to be contacted for such purposes.

Who we disclose your data to

We may disclose your personal information to any member of our group of companies, which includes our subsidiaries, our ultimate owner and any entities owned by it (“Group”). Certain members of our Group are located outside of the European Economic Area (“EEA”). We may also give information about you and how you manage your account to the following third parties (“Partners”):

- companies and organisations who provide a service to us or are acting as our agents (including their sub-contractors), on the contractual understanding that they will keep the information confidential and subject to the same legal requirements regarding privacy and security;
- to any person authorised by you and to any other person notified by you as authorised to give instructions or to use the account or products or services on your behalf;
- any third party as a result of any restructure, sale or acquisition of any company within our Group, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us.

Where necessary and/or required by law, we may also disclose your data to: credit reference agencies, fraud prevention agencies, debt collection agencies, law enforcement agencies, regulators, courts and public authorities and emergency services.

We will retain your personal data after the closure of your account, or if your application is declined or abandoned, for as long as permitted or required for legal, regulatory, fraud and other financial crime prevention purposes and for lawful permitted business purposes.

Data transfers out of the EEA

We may store, process and/or transfer the personal information you submit to Partners located in countries outside of the EEA including (without limitation) the USA for business and management purposes, to perform a contractual obligation owed to you and/or to provide you with information or services that you have requested. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with applicable law.

Marketing

You will always have the ability to opt out of any promotional contact or use of your personal data for promotional purposes. Your information will not be given or sold to any outside organisation for use in marketing without your consent. We may use the contract details provided by you to keep you informed about products and services that may be of interest to you. Where you have provided specific consent, communications may include promotions from relevant third parties. You may tell us at any time if you do not wish to receive marketing communications from us and/or third parties online by responding to the marketing communication, using your online account or by contacting us and advising us of the types of communication that you no longer wish to receive.



Use of Cookies

To optimise your experience at our website we may use cookies. Cookies are alphanumeric identifiers that are transferred to your computer's hard drive through your web browser. Some cookies allow us to make it easier for you to navigate our website and services, whilst others are used to enable a faster login process or to allow us to track your activities on our website.

You may elect to disable cookies by selecting the corresponding option in your web browser: each browser is different; so check the "Help" menu of your browser to learn how to change your cookie preferences. Please note that if you do not accept incoming cookies you may not be able to take full advantage of all of the website features and some may not work at all.

Managing Your Data

You are entitled to see the information we hold about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us. You can request the deletion of any of your personal data and upon such request, we will delete or suspend access to such data to the extent permitted by law. You can request any changes or deletion of your personal data kept by us by contacting us at any time. Such information request may be subject to a small administration fee.

Changes to this policy

We may change this privacy policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, provide you with additional notice (such as adding a statement to our homepage or sending you an email notification).

Contact Us: Transact Payments Limited at 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA.