

# PRIVACY POLICY

## Introduction

This prepaid card is issued by PSI-Pay Ltd with programme management provided by Card Compact Ltd (CCL), both of which are committed to protecting your privacy. All data is collected, transferred, processed and maintained in accordance with the principles contained within the General Data Protection Regulation Act 2018. We recognise our responsibility to keep your information confidential and secure. Any personal information about you which we obtain in connection with your prepaid card registration and eAccount operation, we undertake to keep safe. We will not share this information with other people or businesses, other than stated in this policy, without your prior consent.

The following statement explains our policy regarding the personal information we collect about you.

## How we collect and use information

To enable us to issue your Prepaid Card and set up your eAccount, we need to obtain information at registration which includes your full name, your e-mail and home addresses, your date of birth, nationality and other relevant personal details if we are legally required to do so. As a registered user, you have the option to view, change or revise, your personal data (with the exception of your username or personal details which may require us to validate the new information) at any time. After logging in to the Website, you may change your information in the Personal Details area.

The information that you provide will only be used by the method and for the purposes described at the time of your registration and where applicable in the Terms and Conditions that apply to the relevant product or service. We will also collect, store and process your personal information on our computers to develop and improve our overall service to you, communicate with you and to manage your eAccount.

We give access to your personal information only to those employees who require it to provide our services. If you do not want to receive marketing communication, please log in to your account and manage your settings for communications. We will not disclose any such information outside of CCL except in the limited circumstances described below, as permitted by applicable law, or with your express permission:

- To fraud prevention agencies and other organisations including law enforcement agencies who may use the information to prevent fraud and money laundering, or in order to assist us in investigating suspected violations of our Terms and Condition
- To persons acting as our agents, in this instance our co brand partners Payselect GmbH, Friedrich-Ebert-Anlage 35-37, Tower 185, 60327 Frankfurt am Main, under a strict code of confidentiality
- To the transaction processor Global Processing Services, 18-20 Hill Rise, Richmond, TW10 6UA UK, which we use for the processing of your card transactions
- To third parties including card bureaus which we use for the production of your plastic card. Details of our current suppliers can be provided upon request
- To other third parties for the processing of customer identifications services including KYC verification. Details of our current supplier can be provided upon request.
- To Auditors, for the purpose of reviewing our regulatory compliance. Details of our current suppliers can be provided upon request
- To our scheme provider Mastercard, in relation cardholder information they may require in reference to chargebacks or disputes, audits and other exceptional cases. Details of the relevant contact office can be provided upon request

- Other Banks, in relation cardholder information they may require in reference to chargebacks or disputes, audits and other exceptional cases. Details of the relevant contact office can be provided upon request
- As required by law or regulation

To fulfil some of the above processes we may have to pass your information to other parts of our group of companies or trusted partners, which may be in other countries within the EU. We will make sure that they agree to apply the same levels of protection as we are required to apply to information held in the UK and to use your information only for the purpose of providing the service to us. We will not transfer your information outside of the EU without prior consent, however if it is transferred outside the EU, then the same protection will be afforded as that provided within the EU.

As with any other business, it is possible that CCL in the future could amalgamate or merge with or be acquired by another company. If such acquisition occurs, the successor company would have access to the personal information maintained by CCL, including customer eAccount information, but would continue to be bound by this Privacy Policy unless and until it is amended as described above.

### **How we apply our policy**

In order to put our policy into practice, we use our best endeavours to follow these guidelines:

- We will ensure our systems are secure to protect your personal information from misuse
- We will not hold your personal information for longer than is necessary
- We will not sell, trade, or rent your personal information to other people or businesses unless we have your consent; with your consent, we will only share your information with carefully chosen, reputable and trustworthy third parties
- We will comply promptly with any instructions from you to update your information or requests from you to see the information that we hold on you
- We will comply with lawful requests to disclose personal information to certain authorities (e.g. the police)
- We may monitor and record any telephone calls to ensure we follow your instructions correctly and to improve our service

If you would like a copy of the information we hold about you, please write to: Card Compact Limited, 483 Green Lanes, London N13 4BS. There will be no charge for this access normally although we do reserve the right to charge an administration fee of €10 for this service if we receive multiple requests for the same information or if the request is overly complex.

### **Security of your personal information**

Card Compact is committed to ensuring the protection of your personal information. We employ various technologies and security measures so that we may ensure the protection of your personal information and avoid their consultation, their use, or their disclosure without your authorisation. For example, we store the information that you provide us in servers with limited access which are located in supervised installations. When we transmit confidential information on the Internet (a credit card number, for example), this data is protected by a cryptographic system like the SSL protocol (Secure Socket Layer).

### **Links to other websites**

This Website includes links to other websites. These are outside our control and not covered by this policy. If you access those websites via the links, use of those websites will be in accordance with the privacy policy of those website operators, which may differ from ours.

### **Use of data**

We use the data you provide to fulfill and complete your order. When necessary, your data may be passed on to the shipping company assigned to the delivery (name, address, poss. telephone number for confirming delivery dates). To process payments, we pass on the relevant payment data to our principal banking institution. Your data will not be shared with any additional third parties nor will it be used for marketing purposes. Upon conclusion of the contract and receiving full payment, your data will be locked for further processing and deleted after fulfilling tax and trade law requirements.

**Security:** Your personal data is encoded and transmitted over the internet using 256-bit SSL encryption. Our website and other systems are protected by various technical and organizational measures against the loss, destruction, access, changes or distribution of your data by unauthorized persons. In spite of regular controls, complete protection against all risks is not possible.

### **Money Laundering**

We are required by law to review transactions and report any which may be suspected of being related to money laundering activities.

### **Information**

You are entitled to information about your stored data free of charge as well as a right to rectification, refusal of access or deletion of your data where appropriate. Please contact [support@cardcompact.com](mailto:support@cardcompact.com) or send us your request by post or fax if you have queries concerning the ascertainment, processing or use of your personal data, require information or wish to rectify, delete or refuse access to your data. Please note that any deletion request will be permitted provided it is in line with legal data retention requirements. Further information about data protection is available online at the website of the Information Commissioner: [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk).

### **Changes to this statement**

We may change this Privacy Policy to keep up to date with changes in legislation and best practice. Where there is a material change to this Policy we will notify you accordingly with sufficient notice.

### **Notification of changes**

We reserve the right to modify or amend this Privacy Policy at any time and for any reason. When changed, we will provide notice to you on our Website that it has been changed.

### **Cookies**

In this shop, information concerning the content of your shopping basket is stored in the cookies so that this can then be recalled the next time your visit the site. We require your customer data if you register with us or wish to place an order. The data stored in the cookies means that you do not need to complete the form in the future. The generated cookies remain stored for a period of six months. You can also use your browser program to administer the acceptance of cookies from this page and also block them if desired.

### **Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) is transmitted to and stored by Google on servers in the United States. Google uses this information to evaluate your use of the website, compile reports on

website activity for website operators and provide other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or when third parties are used to process information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

**Cards are issued by PSI-Pay Limited pursuant to a license from Mastercard International Incorporated. PSI-Pay Limited is regulated and authorised by the Financial Conduct Authority of the United Kingdom under the Electronic Money Regulations 2011 (register reference 900011) for the issuing of electronic money and registered in England & Wales. Registered Office: Afon Building, Worthing Road, Horsham, West Sussex, England RH12 1TL. Registered No. 5899168. At all times the Card remains the property of PSI-Pay Limited.**

**Mastercard is a registered trademark, and the circles design is a trademark of Mastercard International Incorporated.**