

# **Prepay Technologies Ltd Privacy Policy**

## **Who we are**

Prepay Technologies Ltd is a company registered in England and Wales with company number 04008083 and a registered office at Station Square 1 Gloucester Street, Swindon, Wiltshire, SN1 1GW, United Kingdom.

## **and**

PPS EU SA (a subsidiary of Prepay Technologies Ltd), a company registered in Belgium with company number 0712.775.202 and a registered office at Boulevard du Souverain 165, Boîte 9, 1160 Brussels, Belgium.

Together referred to as "Edenred PayTech", "Our" and "We" herein.

You can email Edenred PayTech at [contact@prepaysolutions.com](mailto:contact@prepaysolutions.com) or you can call Edenred PayTech on 0845 303 5303 (+44 845 303 5303 from outside the UK).

## **Cards and Accounts**

This Privacy Policy is only applicable to Cards and/or Accounts ("Card") issued by Edenred PayTech. The Terms and Conditions relating to your Cards and/or Accounts will clearly state whether your Cards and/or Accounts are regulated as E-Money or payment services. If you are not sure, please do ask for clarification by contacting [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com).

Edenred PayTech is the Data Controller in relation to your Cards and/or Accounts and all necessary activities relating to the operation of the Cards and/or Accounts: allowing you to receive, activate and use your Card (activating, managing and using your online account where applicable, making and receiving payment transactions, meeting legal requirements, answering requests, providing information to you). You may be the Customer, or you may be a person that has been provided with Cards and/or Accounts by the Customer.

## **Programme Managers and Card Distributors**

If you provide any personal information to the Programme Manager or Card Distributor (i.e. the business that provided your Card) relevant to your Card, the Programme Manager and Card Distributor are each a separate Data Controller for their own activities and you can view their Privacy Policy on their website. They also act as Data Processors on our behalf in relation to the Card. If you are not sure, please do ask for clarification by contacting [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com)

## **Retail Gift cards and other Cards which are not regulated as E-Money**

If you have a product such as a gift card where Edenred PayTech is acting as a Data Processor and the product is not regulated as E-Money, please go to the website of the party that has issued the relevant gift card and details of how your personal data will be processed will be set out in this party's own privacy policy. If you are not sure, please do ask for clarification by contacting [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com)

## Contact details for the Edenred PayTech Data Protection Officer

Our Data Protection Officer can be contacted at PO Box 3883, Swindon SN3 9EA or at [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com)

## The purposes and legal basis for processing your personal information

Processing is necessary for the performance of your contract with Edenred PayTech and for the issue and operation of Cards and/or Accounts and is necessary for compliance with legal obligations applicable to Edenred PayTech such as financial crime prevention. Edenred PayTech may share your information with third parties including Mastercard, Programme Managers and Card Distributors as necessary for the performance of your contract with Edenred PayTech.

## Financial crime prevention

Edenred PayTech will use your personal information to help decide if your accounts may be being used for fraud or money-laundering. We may detect that an account is being used in ways that fraudsters work, or we may notice that an account is being used in a way that is unusual. If we think there is a risk of fraud, we may stop activity on the accounts or refuse access to them.

We might also check and share your information with law enforcement and fraud prevention agencies, judicial bodies, government entities, tax authorities or regulatory bodies. If fraud is identified or suspected, these agencies may keep a record of that information and we may refuse to provide any services.

## Categories of personal information and collection

Type of personal information	Description
Personal Details	Full name and date of birth
Contact Details	Where you live and how to contact you including phone numbers and e-mail addresses
Transactional Data	Details about your Card, use of your Card and payments to and from your accounts
Contractual information	Details about the products or services we provide to you
Locational Data	Data we get about where you are, such as may come from your mobile phone, the address where you connect a computer to the internet, or a shop where you buy something with your Card
Behavioural Data	Details about how you use our products and services
Technical Data	Details on the devices and technology you use
Communications	What we learn about you from letters, emails and conversations between us
Documentary Data	Details about you that are stored in documents in various formats, or copies of them. This could include things like your passport, drivers' licence or birth certificate collected to fulfil customer due diligence requirements

Personal information will only be collected directly and voluntarily from you as part of the application process or as a result of transactions relating from the use of your

Cards and/or Accounts. Some personal information may be verified by Edenred PayTech with use of publicly accessible sources to fulfil customer due diligence.

### **Sending personal information outside of the EEA**

Edenred PayTech will only send your personal information outside of the European Economic Area (EEA) to:

- Follow your instructions
- Comply with a legal duty

In relation to personal information processed by Mastercard certain processors are located outside of Europe. Personal information processed by Mastercard is subject to Mastercard Binding Corporate Rules which you have enforcement rights under as a third-party beneficiary.

### **Recipients (or categories of recipients) of personal information**

Edenred PayTech is committed to ensuring that your information is secure with us and with third parties who act on our behalf. These third parties include Mastercard, card manufacturers, suppliers of identity validation services, IVR and call recording (telephone) suppliers and (if relevant) the Programme Manager. We use many tools to make sure that your information remains confidential and accurate, and we may monitor or record calls, emails, text messages or other communications in order to protect you and us.

### **Retention of personal information**

We don't keep your information for longer than we need to, which is usually up to 7 years in the United Kingdom and up to 10 years in the EEA after the end of the relationship or upon termination of the contract, unless we are required to keep it longer (for example due to a court order or investigation by law enforcement agencies or regulators).

### **Your Rights**

You have certain legal rights to control what we do with your information. These include:

<b>Access</b>	You have a right to access the personal information we hold about you
<b>Rectification</b>	You have a right to rectification of inaccurate personal information and to update incomplete personal information
<b>Erasure</b>	You have a right to request that we delete your personal information
<b>Restriction on processing</b>	You have a right to request us to restrict a processing of your personal information
<b>Objection to processing</b>	You have a right to object to the processing of your personal information
<b>Portability</b>	You have a right to personal information portability

<b>Marketing</b>	You have a right to object to direct marketing
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To exercise any of your legal rights, you can register your request [here](#) or email Edenred PayTech at [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com) or you can write to Edenred PayTech DPO at PO Box 3883, Swindon SN3 9EA.

### **Your right to lodge a complaint with the Information Commissioner's Office**

If you wish to raise a complaint on how we have handled your personal information, you can contact our Data Protection Officer. We hope that we can address any concerns you may have, but if we fail to address your complaint you can contact either the:

- Information Commissioner's Office (<https://ico.org.uk/>) if you are a United Kingdom resident; or
- Data Protection Authority (<https://www.privacycommission.be>) if you are an EEA resident.

### **If you choose not to give personal information**

If you choose not to give us your personal information, it may mean that we cannot perform services needed to run your Cards and/or Accounts. It could mean that we cancel your Card, Accounts or services you have with us.