

GoCardless

# GOCARDLESS PRIVACY NOTICE

Updated 11 July 2024

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# Who is GoCardless?

GoCardless provides the technology and other services that help merchants around the world process payments for their goods or services. Your data controller is:

**GoCardless Ltd.**  
**Sutton Yard, 65 Goswell Road**  
**London, EC1V 7EN**  
**United Kingdom**

## If you have a question or a problem

You can [contact our Data Protection Officer](mailto:help@gocardless.com) (help@gocardless.com) to ask a question or exercise your rights or choices about our privacy practices.

If we can't resolve your concerns, you may have the right to complain to a [data protection authority](#) or other regulator where you live or work, or where you believe a breach may have occurred.

## Identifying and contacting your merchant

If you have questions about how a merchant handles your personal data, or if you wish to exercise your rights for the personal data they hold, you will need to contact them directly. If you don't recognise a payment on your bank statement, find out who your merchant is [here](#).

# Payers

*Our privacy practices for people who make a payment using GoCardless*

## How does GoCardless use personal data?

<p><b>Providing payment services</b></p> <p>We <b>provide payment services</b> and deliver key features of our service to the merchants you pay using GoCardless, such as displaying transaction history and payment status.</p>	<p><b>Identification</b> <b>Contact</b> <b>Financial</b> <b>Transaction</b> <b>Connection</b></p>
<p><b>Preventing fraud</b></p> <p>We check that you own the bank account you enter for our services and that you have the funds to cover the transaction. We assess whether your activities match patterns of previous fraudulent behaviour. We may block transactions we believe to be fraudulent or unauthorised, or that violate our terms.</p> <p>When you set up a payment, we may ask you to grant us access to personal data directly from your bank account so that we can <b>verify that you are the owner of the account</b>. This data is limited to your bank account number, name, address, and</p>	<p><b>Identification</b> <b>Contact</b> <b>Financial</b> <b>Transaction</b> <b>Usage</b> <b>Connection</b></p>

<p>we access it only with your consent. <a href="#">(You'll also see your account balance on the screen. Read more about why it's there and what happens to it.)</a></p> <p>If our fraud alerts or those of our banking partner flag a potentially fraudulent account, payment or refund, we may need to confirm your identity. We use financial, transaction information and publicly available data or identity verification services from agencies like Onfido or Lexis Nexis. After this, we will either clear the alert or stop the payment or refund.</p> <p>Technology helps us make <a href="#">automatic decisions</a> about potential fraud using our services. <a href="#">Read more about our fraud prevention tools.</a></p>	
<p><b>Increasing payment speed and success</b></p> <p>We calculate whether a payment is likely to clear and use that calculation to make decisions about how we provide our services. For example, we might ask for a different payment method or change the date we withdraw the payment from your bank, or we might advance payments to your merchant to process their transactions more quickly.</p> <p>Technology helps us make <a href="#">automatic decisions</a> about how and when to process transactions.</p>	<p><b>Identification Contact Financial Transaction Connection</b></p>
<p><b>Communicating with you</b></p> <p>We send you messages that are necessary for our services, like <b>payment notification emails</b>. If you need help, we communicate with you to provide <b>customer support</b>. We also track open rates and measure the effectiveness of our communications.</p> <p>We don't market to consumers who make payments using our services, and we don't sell personal data.</p>	<p><b>Identification Contact Transaction Usage</b></p>
<p><b>Improving our services</b></p> <p>We analyse how people engage with our site and services so that we can <b>improve our services and develop new products or features</b>. For example, we might use personal data and other observations to make our payment pages easier to use or our machine learning models more accurate.</p>	<p><b>Identification Contact Financial Transaction Connection Usage</b></p>
<p><b>Investigating claims and other legal activities</b></p> <p>Where we believe it is necessary to <b>protect our legal rights and interests and the interests</b> of others, we use personal data in connection with legal claims, compliance, regulatory and audit functions, and in connection with the acquisition, merger or sale of a business.</p> <p>Under <b>exceptional circumstances</b>, we may be required by law to provide personal data to law enforcement agencies, courts or others in connection with claims and other litigation.</p>	<p><b>Identification Contact Financial Transaction Connection</b></p>

## What personal data do we use?

- **Identification information**, such as your name and organisation. In some countries, we may be required by law or by financial institutions to collect a government identifier from you (for example, a social security number or tax ID).
- **Contact information**, such as your mailing address and email address.
- **Financial information**, such as your bank account number, sort code, account holder name, and other information you provide to us or give us consent to access from your bank.
- **Transaction information**, such as the name of the merchant you pay using our services, a description of the transaction, and the payment amount.
- **Usage information**, such as how you enter data on our sites and services and how long it takes, and whether you opened an email or clicked a link. To collect this data we use [cookies and other tracking technologies](#).
- **Connection information**, such as the type of device you use to access our services, operating system and version, device identifiers, network information, IP address and location derived from your IP address. To collect this data we use [cookies and other tracking technologies](#).

## Merchants

*Our privacy practices for people who take payments for their goods and services using GoCardless*

### How does GoCardless use personal data?

<p><b>Providing our payment services</b></p> <p>We <b>provide payment services</b> and deliver key features of our services, such as operating the merchant dashboard, displaying transaction history and payment status, and integrating with partners.</p>	<p><b>Identification</b> <b>Contact</b> <b>Financial</b> <b>Transaction</b> <b>Connection</b></p>
<p><b>Preventing money laundering and financial crime</b></p> <p>We are required by law to <b>conduct due diligence on our merchants</b> and prevent money laundering or other illegal activities. We verify the identities of prospective and current merchants and their employees and beneficial owners. We may conduct background or credit checks and verify your employment history and the businesses with which you are connected. Where applicable, we may access your <a href="#">criminal history</a>, presence on sanctions lists or in adverse media searches, and links to politically exposed persons.</p>	<p><b>Identification</b> <b>Contact</b> <b>Usage</b> <b>Connection</b> <b>Due diligence</b></p>

<p>Technology helps us make <a href="#">automatic decisions</a> about money laundering and financial crime.</p>	
<p><b>Communicating with you</b></p> <p>We send <b>service emails</b>, we <b>alert</b> you to changes in our services, and we communicate with you to provide <b>customer support</b>. Unless you tell us not to, we also <b>promote our services</b> to you, communicate news and industry updates, and communicate with you when we host or participate in events. We also track open rates and measure the effectiveness of our communications.</p> <p>Learn more about our <a href="#">marketing practices</a> and how <a href="#">cookies</a> support some of these activities.</p>	<p><b>Identification Contact Usage</b></p>
<p><b>Preventing fraud or unauthorised use</b></p> <p>We <b>analyse merchant interactions</b> with GoCardless to make sure our merchants are using our services legitimately. We assess whether your activities match patterns of previous fraudulent behaviour.</p> <p>We check to see if merchants are authentic, and we may block transactions or suspend accounts we believe to be fraudulent or violate our terms.</p> <p>Technology helps us make <a href="#">automatic decisions</a> about fraud and unauthorised use. <a href="#">Read more about our fraud prevention tools.</a></p>	<p><b>Identification Contact Financial Transaction Usage Connection Due diligence</b></p>
<p><b>Measuring satisfaction</b></p> <p>We <b>try to understand</b> how merchants feel about our services so that we can resolve issues and make improvements. We send surveys to merchants and use other tools to seek and measure feedback and engagement.</p>	<p><b>Identification Contact Transaction Connection</b></p>
<p><b>Improving our services</b></p> <p>We analyse how people engage with our site and services so that we can <b>improve our services and develop new products or features</b>. For example, we might use personal data and other observations to make our dashboard easier to use or our machine learning models more accurate.</p>	<p><b>Identification Contact Financial Transaction Connection Usage</b></p>
<p><b>Investigating claims and other legal activities</b></p> <p>Where we believe it is necessary to <b>protect our legal rights and interests</b> and the interests of others, we use personal data in connection with legal claims, compliance, regulatory and audit functions, and in connection with the acquisition, merger or sale of a business.</p> <p>Under <b>exceptional circumstances</b>, we may be required by law to provide personal data to law enforcement agencies, courts or others in connection with claims and other litigation.</p>	<p><b>Identification Contact Financial Transaction Connection Due diligence</b></p>

## What personal data do we use?

When you set up and use a GoCardless account, we collect personal data about you and your company's employees, directors, trustees or beneficial owners. That includes:

- **Identification information**, such as name, job title, birthdate, nationality, government-issued identification (for example, a passport or driver's license), and account username and password.
- **Contact information**, such as email address, phone number, work address, company or organisation name, country and language.
- **Financial information**, such as sort code, bank account number and account holder name and address.
- **Transaction information**, such as the names of transacting parties, transaction description, payment amounts, and the devices and payment methods used to complete the transactions.
- **Usage information**, such as how you enter data on our sites and services and how long it takes, and whether you opened an email or clicked a link. To collect this data we use [cookies and other tracking technologies](#).
- **Connection information**, such as the type of device you use to access our services, operating system and version, device identifiers, network information, log-in records, IP address and location derived from it.
- **Due diligence information:** Identity verification, background check and credit references (for example, Onfido, LexisNexis or Creditsafe), from financial institutions (such as our banking partners), from social media such as LinkedIn, or from other public sources.

## Account holders

*Read about our privacy practices for people who securely access and share their bank account data.*

## How does GoCardless use personal data?

<b>Accessing your account data</b>  We provide you information about your account, you can share this information with other service providers.	<b>Identification Contact Account Usage Connection</b>
<b>Organising and categorising your account data</b>  We retrieve and organise your raw transaction data, group your transactions into categories, such as grocery shopping, income or leisure.	<b>Identification Contact Account Transaction</b>

<p>We enrich your transaction data with details about the recipient of payment or location of the payment (for example branch of a shop you paid at). When you share your information with other service providers, they may use additional information to deliver their service. They will explain how your data is used in their privacy notice. Please make sure you also read their privacy notice.</p> <p>Technology helps us make <a href="#">automatic decisions</a> about the categories of your transactions and select the data we use to enrich your transactions.</p>	<p><b>Location Usage Connection</b></p>
<p><b>Improving our services</b></p> <p>We analyse how people engage with our site and services so that we can improve our services and develop new products and features. For example, we might use personal data and other observations to make our product easier to use or our machine learning models more accurate.</p>	<p><b>Contact Account Usage Connection</b></p>
<p><b>Providing customer support</b></p> <p>We send you messages that are necessary to deliver our services. If you need help, we communicate with you to provide customer support. We also track open rates and measure the effectiveness of our communications.</p>	<p><b>Identification Contact Usage Transaction</b></p>

## What personal data do we use?

- **Identification information:** such as your name. In some countries, we may be required to collect a government identifier from you, for example, a social security number or a tax ID
- **Contact information:** such as your mailing address and email address
- **Account information:** such as your sort code, account number, IBAN, BBAN, account type and account balance ([read more](#))
- **Transaction information:** such as the transaction amount, transaction location, payment sender and payment recipient ([read more](#))
- **Location information:** such as the location of merchant you have paid with
- **Usage Information,** such as how you enter data using our sites and services and how long it takes, and click on a link. To collect this data we use [cookies and other tracking technologies](#).
- **Connection information,** such as the type of device you use to access our services, operating system and version, device identifiers, network information, IP address and location derived from your IP address. To collect this data, we may use [cookies and other tracking technologies](#).

- **Other data about you.** When you share your information with a chosen service provider, they may use additional information to deliver their service. They will explain what and how your data is used in their privacy notice so please make sure to read it.

## Prospects and Visitors

*Our privacy practices for people who visit our website or who work for companies we think might be a good fit for our services*

### Our marketing and your choices

Like many businesses that sell to other companies, we have a [legitimate interest](#) in engaging in sales, marketing and lead generation activities. We respect your right to opt out of these activities, which you can do at any time by clicking the “unsubscribe” link in one of our emails or asking a GoCardless caller to take you off our lists. You can ask us at any time not to carry out profiling for direct marketing, or to stop using profiling and marketing cookies using our [cookie preference tool](#).

**Where did we get your email address?** If you didn’t provide it to us yourself by requesting content or registering for an event, we may have found it online or purchased it as part of a lawfully acquired list. We might have just found your name and used the services of an email verification tool, or we may have guessed it from the normal email style of your company. Wherever it came from, you can tell us not to contact you again using the unsubscribe link in the footer of the email you received or by contacting support at any time.

### How does GoCardless use personal data?

So that we can sell our services and grow our business, we identify and communicate with people at companies that might be a good fit for our services. We provide you with the content or service you request, and we also collect and use personal data to:

#### Market our services to you

- We send marketing emails and campaigns
- We make sales calls
- We target advertising to you online and on social media
- We measure which campaigns lead to the most sign-ups

#### Understand and improve our services

- We gather website analytics and track email open rates
- We observe and test the effectiveness of our content and website

### Here is more detail about how and why we engage in these activities:

Providing you with our content and services	Identification Contact
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<p>We operate our website, share white papers and guides, and host webinars and live events.</p> <p>We use <a href="#">strictly necessary or functional cookies</a> for these activities.</p>	<p><b>Company Interaction Connection</b></p>
<p><b>Identifying prospective customers</b></p> <p>We try to identify the companies who are most likely to use our services and the contact details of employees of those companies who make those kinds of decisions. We may purchase data from third parties like list brokers, or our internal sales teams may research the data.</p> <p>We monitor suppliers and our sales teams to ensure that they use appropriate sources, for example, the data you share on LinkedIn or that appears in public news sources.</p>	<p><b>Identification Contact Company Preferences</b></p>
<p><b>Operating webforms and online chat tools</b></p> <p>When you fill in a webform or interact with our online chat tool because you want to get in touch with us, download a GoCardless white paper, or participate in an event, we use the information you share as a way to assess if you are a potential customer and to contact you if we think you might be interested in our services.</p> <p>We use <a href="#">functional cookies</a> for these activities.</p>	<p><b>Identification Contact Company Interaction Connection</b></p>
<p><b>Targeted online marketing</b></p> <p>We try to identify and communicate online with people from companies who might be a good fit for our services, through practices like <b>retargeting and account-based marketing</b>.</p> <p>When someone visits our website, we check the IP address they came from, and we try to match it to a company. Cookies and services from companies that offer <b>account-based marketing</b> help us do this. We might use what we learn this way to tailor the content you see on our website. For example, if you work for a company in a certain industry, we may show you content about how we can help solve payment problems for that industry.</p> <p>After you leave our website, we may purchase online advertising that is shown to you on other sites you visit. We tailor this <b>retargeted advertising</b> to you based on the way you interacted with our website (for example, which pages you visited). Account-based marketing tools also help us show you advertising that might reference the company you work for.</p> <p>We analyse the effectiveness of our marketing and advertising campaigns. We define our targeted audience using the results of previous campaigns, interactions with our posts and industry trends.</p> <p>Where we've identified you as a likely customer, you may be part of an online or email marketing campaign targeted to decision-makers at your company.</p> <p>We use <a href="#">advertising cookies</a> for these activities.</p>	<p><b>Identification Contact Company Interaction Connection Preferences</b></p>
<p><b>Social media marketing</b></p> <p>Tools from social media companies and other companies that support social media marketing help us identify and communicate with people from companies who</p>	<p><b>Social media</b></p>

<p>might be a good fit for our services, through practices like <b>social media lookalikes, hashtag analysis and targeted advertising.</b></p> <p>We use social media lookalike tools from companies like Facebook, Twitter and LinkedIn. These tools analyse lists we share with them of the kinds of customers we'd like to market to, and show GoCardless online marketing to their users with similar interests or profiles.</p> <p>We analyse hashtags used and posts liked, to help us understand industry trends and define the best audience for our product.</p> <p>We use publicly available information to help us do this, in line with industry practice. If you want to know how your public information is used, you can learn more about your privacy choices on (<a href="#">Facebook</a>, <a href="#">Twitter</a>, <a href="#">Instagram</a>, <a href="#">LinkedIn</a>).</p>	
<p><b>Analytics and A/B testing</b></p> <p>We use cookies and other online tools to understand how visitors use our site and services, to analyse how effective they are, and to test how people might respond to changes to our site and services.</p> <p>We use <a href="#">analytics cookies</a> for these activities. Sometimes we record browser sessions. <a href="#">Read more about how we use Full Story.</a></p>	<p><b>Interaction Connection</b></p>
<p><b>Marketing attribution</b></p> <p>We measure the effectiveness of our marketing campaigns by trying to connect a merchant's or prospect's activity to the marketing campaign that reached them.</p> <p>We use <a href="#">advertising cookies</a> and performance information about our social media posts for these activities.</p>	<p><b>Identification Contact Company Interaction Connection</b></p>

## What personal data do we use?

- **Identification information**, such as name, job title.
- **Contact information**, such as email address, phone number, work address, country and language.
- **Company information**, such as company or organisation name, industry, size and other details that allow us to understand whether the company is a good fit for our services.
- **Connection information**, such as type of device you use to access our services, operating system and version, device identifiers, network information, IP address and location derived from it.
- **Social media information**, such as your handle on sites like Facebook, Twitter, LinkedIn or Instagram, and how you like or share our posts and other publicly available information.
- **Interaction information**, how you came to our website, which pages you visit and what you do while you're there, how long you remain on a page or view a video, whether you opened an email or clicked a link, records of your contact by phone, email, webform or chat, and the reasons for the communication.

- **Preferences**, such as the types of services that may interest you, whether you have agreed to receive marketing information or newsletters about our services, or whether you have opted out.

## Legal basis for processing

In many of the countries where we operate, data protection law requires us to process personal data only where we have an approved basis under the law. You have the right to understand what our legal bases are, so we explain them here. We use the following bases, depending on the activity we undertake:

### Performing a contract

In most cases, the data we collect and the things we use it for are necessary for us to provide our services to merchants and payers.

For example, when we execute payment transactions, provide our merchant dashboard, or show a payer which merchant is responsible for a payment, we are complying with GDPR Article 6(1)(b).

### Complying with law

Some of the activities we undertake are necessary to comply with our legal and other obligations as a payment provider.

For example, we process personal data for:

- Anti-money laundering and sanctions compliance
- Activities connected with claims and litigation

To comply with our anti-money laundering and customer due diligence obligations, we must collect information on merchant criminal history. Where we do so, we comply with the requirements of law for collecting this category of data. For example, in the UK, we collect this data under the "substantial public interest conditions" of Schedule 1 of the UK Data Protection Act 2018.

### Meeting our legitimate interests

We use personal data as necessary to meet our legitimate business interests. When we do, we make sure we understand and work to minimise its privacy impact. For example, we limit the data to what is necessary, control access to the data, and where we can, aggregate or de-identify the data.

Some examples of the data processing activities we undertake in our legitimate interests are:

- Preventing fraud and unauthorised use
- Preventing payment failures and speeding up payment processing times
- Marketing our services to prospective merchants
- Communicating news and industry events to our current and prospective merchants
- Hosting and participating in events
- Developing and improving our products and services

**What is legitimate interest?** Under GDPR Article 6(1)(f), companies have the ability to engage in activities without consent under a balancing test. Do we have a legitimate interest in engaging in the activity that is not outweighed by the interests or fundamental rights and freedoms of the data subject?

### **With your consent**

In some cases, we process personal data with your specific and informed consent. We tell you in the service where you can make a choice or grant consent. If you have granted consent, you may [withdraw it](#) at any time to stop any further processing.

## **Automatic decision-making**

Technology helps us make automatic decisions based on the information we collect about you or a transaction. We routinely test our software to improve the accuracy of these decisions and to prevent unintended bias. These decisions can have effects for you, such as:

1. **Requiring additional steps** to authenticate your identity or verify your bank account, if the patterns we monitor indicate that doing so would make our services safer and more effective.
2. **Preventing access to our services**, if we determine there is a high likelihood that it would violate our regulatory requirements – for example, if the identification you provide does not match public records, identity verification or credit reference information.
3. **Pausing services**, if we need more information to investigate or prevent suspected fraud or financial crime – for example, if your behaviours match patterns of previous fraudulent activities.
4. **Cancelling transactions**, if we determine there is a high likelihood that there are insufficient funds to cover it or that it is fraudulent – for example, because the payment is made from a location that does not match our records.
5. **Cancelling the service**, if we determine that it is being used in violation of our terms – for example, if any of the activities you conduct appear on our list of restricted activities.
6. **Sharing mis-categorised data**, in cases where we collate and package up information about you as part of a feature we offer to your service provider – for example, if the underlying raw data was not clear, or our categorisation was not accurate

If you believe a decision has been made in error, please [contact us](#).

## **Your rights and choices**

You may have rights under privacy and data protection law. Depending on where you live, these include the right to **ask GoCardless for a copy** of your personal data, to **correct, delete** or **restrict** processing of it, and to **obtain personal data in a format you can share with a new provider**. You may have the right to object to processing. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data.

You can contact our privacy team to ask a question about our privacy practices or exercise your rights. If you have unresolved concerns, you have the **right to complain** to a [data protection](#)

[authority](#) or other regulator where you live or work, or where you believe a breach may have occurred.

## How is personal data shared?

We don't sell personal data. We share personal data with recipients under lawful conditions as required to perform our services or operate our business.

### Parties in your transaction

We share personal data with the merchants, payers and financial institutions involved in a transaction, wherever they might be located.

[Learn more](#) about how your personal data travels through the banking system.

### Service providers

Other companies help us conduct the activities described in this privacy notice.

We work with service providers who have access to personal data when they provide us with services, like technical infrastructure, web and app development, and marketing, analytics and survey tools. We impose strict restrictions on how service providers store, use and share data on our behalf. We also work with companies who provide identity verification, background screening, due diligence, consulting and other regulatory services for us.

Review a [list of our material suppliers](#).

### Integration partners

GoCardless works with companies who integrate our payment services into their applications; we call these partners..

When you make a payment through a [partner integration](#), or when you set up a merchant GoCardless account with one of our partners, your personal data will be shared with the partner to provide the integrated services.

### GoCardless companies

Where financial regulations require it, we share merchant and payer data with the GoCardless entity who holds a license in that country. In other countries, we share merchant and prospect data with the local GoCardless entity that helps us sell our services.

Some GoCardless companies in our corporate family help us provide our regulated services in the country where they are located. GoCardless Ltd in the United Kingdom is our headquarters office and where the majority of our personal data is processed. GoCardless SAS in France provides our services in the EU under a French financial services license. We must share merchant and payer data with GoCardless SAS to provide our services. These entities process and handle merchant and payer personal data to execute transactions and provide our services.

We also share merchant and prospect data with the local GoCardless entity or office in countries where we house sales offices, for example GoCardless GmbH in Germany, SIA Noridgen Solutions in Latvia, the GoCardless sales office in Australia, and GoCardless Inc. in the USA. They use

merchant and prospect data to market our services and provide support to local merchants and partners.

All GoCardless companies are governed by our global privacy program and subject to this privacy notice.

#### **To a purchaser of our business**

If ownership or control of all or part of our business or assets changes, we may transfer personal data to the new owner.

If the owner will use the data for purposes other than those disclosed here, they will take the steps required by law to ensure such purposes remain lawful.

#### **Other exceptional circumstances**

We share personal data when we think it's reasonably necessary to protect ourselves and the people who use our services, enforce agreements, respond to emergencies and comply with law.

In exceptional circumstances, we share personal data with government agencies and other third parties if we believe it is reasonably necessary to comply with law, regulation, legal process or governmental request; to enforce our agreements, policies and terms; to protect the security of our services; to protect GoCardless and our merchants, payers or the public from harm or illegal activities; or to respond to an emergency.

## **International transfers**

GoCardless' services are offered from our United Kingdom headquarters and from GoCardless offices in France, Germany, Australia and the United States. Our services are available to merchants in [a number of countries around the world](#). If you use our services to pay a merchant in another country, personal data will be transferred as necessary to complete this transaction.

Personal data may also be stored and accessed by service providers located in other countries. For EU individuals, it's important to note that some of our service providers are located in the United States or other countries that do not provide the same standard of data protection as the EU. Wherever we transfer data, we enter into contracts or seek other ways to ensure service providers treat data as required by law in the country where it was collected.

## **How long do we keep personal data?**

GoCardless keeps personal data for as long as necessary to provide our services and process payments for our merchants. We also keep personal data for other legitimate business purposes, such as complying with our legal obligations, resolving disputes, preventing fraud, and enforcing our agreements. Because these needs can vary for different data types used for different purposes, retention times will also vary. Here are some of the factors we have considered to set retention times:

1. **How long do we need the personal data** to develop, maintain and improve our services, keep our systems secure, execute chargebacks, prevent fraudulent transactions, and store appropriate business and financial records.
2. **Have you asked us to stop using your data or withdrawn your consent?** Where we can delete the data, we will process it for only a short period after this to meet your request. If

needed, we will also keep a record of your request so that we can make sure it is respected in the future.

3. **Are we subject to a legal, regulatory or contractual obligation to keep the data?** For example, we're required to keep transaction data and other information that helps us carry out required checks, for periods of time that vary according to the underlying payments scheme. We may also need to comply with government orders to preserve data relevant to an investigation or retain data for the purposes of litigation.