



Privacy Notice

Afex Offshore Limited, trading as Corpay (hereinafter referred to as 'Corpay', 'we' or 'our'), is committed to protecting the privacy and security of your personal information. Corpay is a registered limited company with the Jersey Financial Services Commission ("JFSC"), registration number 117732.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us pursuant to the Data Protection (Jersey) Law 2018 ("DPJL"), the Data Protection Act 2018 ("DPA18") and the UK General Data Protection Regulation ("UK-GDPR") when needed.

Reference to DPJL will include the DPA18, UK-GDPR and any other data protection law or regulation Corpay complies with throughout its global entities.

Corpay is a "Data Controller", which means we are responsible for deciding how we hold and use personal data. We are also registered with the Jersey Office of the Information Commissioner ("JOIC") – Registration No. 55965.

We will comply with data protection law, the principles of which says that the personal information we hold about you must be: -

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept your data only as long as necessary for the purposes we collected it.
- Kept securely.

Corpay is accountable to you and the Supervisory Authorities to show compliance with DPJL and demonstrate how we are compliant.

The Data Protection Lead ("DPL")

We have appointed a DPL to oversee compliance with this Privacy Notice.

If you have any questions about this Privacy Notice or how we handle your personal information, contact the DPL at dpo@fleetcor.com.

You have the right to make a complaint at any time to the JOIC.

Contact details for the JOIC will be outlined at the bottom of this Privacy Notice.

The Kind of Information We Hold About You

Personal data, or personal information, means any information about an individual from which that person can be identified, directly or indirectly. It does not include data where the identity has been removed (anonymous data).

To explain this to you, we will list our different services when we collect or use additional information about you.

Our Purpose for Processing your Information.

At Corpay we process your personal information only for the purpose it was collected or provided to us by you. Our main purpose is to carry out the service you have instructed us to do on your behalf. This will be a transaction as an individual or as an employee of a larger organisation.

Any personal information we record about you is collected, processed, stored and retained under very secure conditions. This privacy notice will explain to you what we do with your information and on what legal basis we process it.

Some of the purposes of processing will include.

- To provide you with our services.
- To respond to your requests.
- Provide you with support services.
- For our, and our affiliates, marketing purposes, such as to notify you of any products that may be of interest to you.
- For joint marketing with other financial companies.
- To audit and monitor the services that we provide to you.
- To protect against fraud.
- For our, and our affiliates', everyday business purposes such as to process your transactions; maintain your account(s); comply with our legal requirements, respond to court orders and legal investigations; report to credit bureaus; gather information about website access, usage and performance; improve our services and enhance your consumer experience; and validate your creditworthiness or your identity.
- To set up and manage your online account (including, for example, to send password reminders or notifications to changes to your account details) and to process your communication and privacy preferences.
- In addition, we record and monitor telephone calls to evidence business transactions, to ensure quality control and to improve internal training measures.

How Is Your Personal Information Collected?

We collect personal information about you when you contact us, engage us to provide a service or provide us with your data for another specific purpose.

What information do we collect about you?

Your Information

- Title
- Full Name (first, Middle and surname)
- Address
- Telephone number
- Email address
- Signature

Your Identification (suggested documentation)

- Copy of a valid passport
- Copy of a valid Driving License (with Photograph)
- Government issued ID Card
- Utility Bill (not older than 3 months)
- Bank Statement (not older than 3 months)
- Notorised documents

Corpay Customer History

- Tax file information
- ID Number
- credit and payment history
- account balances
- transaction history
- Business contact details

Other Data Collection

- Telephone Voice Messages
- Recorded Telephone calls
- Website contact form and complaint history
- Website analytics
- Customer Service History
- Fraud Department Interaction History

What Special Category Data do we collect about you?

Corpay do not collect Special Category data from customers or users of their facilities unless it forms part of the information you have provided to us. If that is the case, we will explain our legal basis for processing your data and your rights to withdraw consent, if that is the legal basis used at the time.

How We Will Use Information About You?

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- You have entered a **Contract** with us to provide you with a service; an example of this would be when you have engaged Corpay to assist you with foreign exchange requirements as an individual or as an organisation. We are a regulated business and have to record your full details and the full details of all transactions we make on your behalf. These details are retained by law for a period of 6 years post transaction.
- We need to comply with a **Legal Obligation**; an example of this would be when we have

to comply with the legal requirements of the Money Laundering (Jersey) Order 2008 or other regulatory or other legal obligations relating to AML/CFT/CPF and to obtain your full identification, known as CDD. We retain this information and keep it up to date during our relationship with you and for a period of 5 years post relationship.

- Where it is necessary for our **Legitimate Interests** (or those of a third party), your interests and fundamental rights do not override those interests. An example of this is when as a customer or users of our services we make contact with you about a new service or project that we believe you would be interest in or we believe you would expect to receive from us.

We may also use your personal information in the following situations,

- Where you have given your **Consent** to contact you for a specific purpose, such as subscribed to receiving our newsletter or marketing material from us.

Change of purpose

We will only use your personal information for the purposes we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Data Sharing

We do not pass on information gained from your engagement with us without a clear legal basis for doing so. However, we may disclose your Personal Information to meet legal obligations, regulations, or a valid request.

We use certain third parties, also known as processors, to provide or support our services. We have appropriate agreements in place with those processors to ensure the safety of your information. We do not share your information with any processors for the purposes of direct marketing.

The current types of data processors used by Corpay are.

- **Affiliates.** We will disclose your personal information to affiliates that support our core business functions and so that they can offer you information about products and service that they offer if this is in your legitimate interest.
- **Service Providers.** We will disclose your personal information to service providers that support our core business functions, including, but not limited to, services providers that assist with processing payments and orders, maintaining databases, billing, providing credit, complying with governmental or quasi-governmental reporting, collection services, customer service, or communicating with you about surveys, promotions, giveaways, sweepstakes, or contests.
- **Merchants.** We will disclose your personal information to merchants with whom we do business for the purpose of delivering gift cards to you or other people or entities.
- **Joint Promotions.** We will disclose your personal information to affiliates or business partners for the purpose of offering joint promotions, if you have consented to this.

- Acquisitions. We will disclose your personal information to a potential or actual acquirer, successor, or assignee as part of any reorganisation, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in bankruptcy or similar proceedings).
- Required by Law. We will disclose your personal information if required to do so by law or in the good faith belief that such action is appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations or those of any of our affiliates; (vi) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.
- Aggregate and De-Identified Information. We will use for our own business purposes and/or disclose to third parties aggregate and/or de-identified information that does not identify or otherwise relate to an individual, for any purpose, including but not limited to improving our products or services or the products or services of third parties, market research, for project planning, to track the number of daily visitors to a particular web page, to track the size of an order placed on a certain date, and to troubleshoot problems, unless we are prohibited from doing so under applicable law.

Processors are other organisations/services carefully chosen by Corpay to process your information correctly and securely. In the case of organisations outside of Jersey, the United Kingdom and the European Economic Area (EEA);

(a) we have prior written instructions for the transfer or

(b) we have entered into specific contractual terms with them to ensure that they treat your personal data in a way equivalent to that in which they would be required if they were established in Jersey.

Some of our data processors will state in their privacy notice that they will store your personal data in their data centers located within the United States. If you have any questions or concerns you can contact our DPL at dpo@fleetcor.com

We ensure that your privacy rights are respected in line with this Notice and the same protection is given to your personal data as laid down by the DPJL.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, altered or disclosed, or accessed in an unauthorised way. In addition, we limit access to your personal information to those Staff, Agents, Contractors and other third parties on a need to know basis.

They will only process your personal information on our strict instructions, and they are subject to a duty of confidentiality.

Details of these measures may be obtained from our DPL at dpo@fleetcor.com.

Corpay is a multi-jurisdictional organisation and as such your personal data may be transferred

to or accessed from various locations around the world, including the United States of America, Canada, Australia, New Zealand and the United Kingdom, to name a few. Full Privacy Notices for other jurisdictions are available for you to read [here](#).

Canadian Privacy and Cookie Policy: [Click here](#) to view and download the policy.

Australian Privacy and Cookie Policy: [Click here](#) to view and download the policy.

European Privacy and Cookie Policy: [Click here](#) to view and download the policy. This European Notice applies to:

1. The worldwide processing of personal data about individuals located in the European Union.
2. Personal data processed by one or both of Corpay's UK and/or European based entities regardless of the individual data subject's location.

USA Privacy and Cookie Policy:

Our USA policy is comprised of two documents which are to be read together.

1. The main policy document on FLEETCOR Technologies Inc.'s [website](#), (Corpay is a part of FLEETCOR (NYSE: FLT)).
2. This supplementary document, [a GLBA statement](#), focuses primarily on consumer financial privacy protections offered by the US federal statute GLBA (The Gramm-Leach-Bliley Act), as applicable.

Singapore Privacy Policy. The current Singapore privacy policy is the process of being reviewed and updated to align with the provisions of the Personal Data Protection Act. Please note collection and processing of data and transactions for Associated Foreign Exchange (Singapore) Pte Ltd. are executed by the legal affiliate company, Cambridge Mercantile Corp. in Canada, please see the [Canadian privacy policy](#). Canada has adequacy status with EU Privacy Commission with respect to data protection laws.

United Kingdom Privacy and Cookie Policy: [Click here](#) to view and download the policy.

We have put in place procedures to deal with any suspected data security breach and notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

All data is retained securely and only used for the purposes set out in the Law. Data is retained to comply with our statutory obligations and in accordance with our retention schedule. If you would like a copy of our retention schedule, please contact our DPL at dpo@fleetcor.com

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of Access, Correction, Erasure, and Restriction

The personal information we hold about you must be accurate and current. Please keep us informed if your information changes during your relationship with us.

Under certain circumstances, by law, you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This right enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This right enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal information. This right enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** your personal information where we rely on a legitimate interest (or those of a third party). There is something about your situation that makes you want to object to processing on this ground. You also have the right to object to processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This right enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request the erasure of your personal information, object to the processing or request that we transfer a copy of your personal information to another party, contact our DPL at dpo@fleetcor.com

You will not have to pay a fee to access your personal information (or exercise any other rights). However, we may charge a reasonable fee if your access request is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

How to request your information and what we may need from you

You can use the Data Subject Access Request form, available [here](#). You can also email in your request, make your request over the telephone verbally to one of our team, whatever way you feel more comfortable with.

If you have any questions about this process or any of your rights, contact our DPL at dpo@fleetcor.com

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or exercise any of your other rights).

We will respond to your request without undue delay, but certainly within **Four Weeks** after satisfactory verification of your identity. In some circumstances we can apply an eight-week extension to this time frame when the request is complex in nature, and it cannot be answered in the four-week time frame. If this is to happen, we will inform you as soon as possible.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, contact our DPL at dpo@fleetcor.com

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information or requesting you to confirm the accuracy of the information we hold on you.

Complaints

We want the chance to resolve any complaints you have about how we process your information. You have the right to complain to the JOIC about how we have used your data.

The details for each of these contacts are:

Afex Offshore Limited

Vantage House, Third Floor, 5 Anley Street, St Helier Jersey JE2 3QE
Telephone +44 (0) 1534 748200 or email dpo@fleetcor.com

Jersey Office of the Information Commissioner

2nd Floor, 5 Castle Street, St Helier, Jersey JE2 3BT
Telephone +44 (0) 1534 716530 or email enquiries@jerseyoic.org