

## **PPS UK and EU Privacy Policy**

### **Who we are**

PPS (a trading name of PrePay Technologies Ltd) is a company registered in England and Wales with company number 04008083 and a registered office at 6th Floor, 3 Sheldon Square, Paddington, London, W2 6HY, United Kingdom.

### **and**

PPS EU SA (a subsidiary of PPS), is 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 "PPS", "Our" and "We" herein.

You can email PPS at [contact@prepaysolutions.com](mailto:contact@prepaysolutions.com) or you can call PPS 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 PPS. The Terms and Conditions relating to your Cards and/or Accounts will clearly state whether your Cards and/or Accounts is 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).

PPS 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**

If you provide any personal information to the Programme Manager relevant to your Card (this party is clearly identifiable by the branding on your card), the Programme Manager is a separate Data Controller and you can view their Privacy Policy on their website. 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 PPS 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 PPS 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 PPS and for the issue and operation of Cards and/or Accounts and is necessary for compliance with legal obligations applicable to PPS such as financial crime prevention. PPS does not use your personal information for marketing purposes and will not share your information with third parties for marketing purposes.

## Financial crime prevention

PPS 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. In the United Kingdom only, we might also check and share your information with fraud prevention agencies. If fraud is identified or suspected, these agencies may keep a record of that information and we may refuse to provide any services. Law enforcement agencies may access and use this information.

## 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
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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 PPS with use of publically accessible sources to fulfil customer due diligence.

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

PPS 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**

PPS 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 (this party is identifiable by the branding on your card). 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

To exercise any of your legal rights, you can email PPS at [dpo@prepaysolutions.com](mailto:dpo@prepaysolutions.com) or you can write to PPS 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.

## **PPS UK and EU Cookie Policy**

To make the PPS website work properly, we sometimes place small data files called cookies on your device.

### **What are Cookies?**

A cookie is a small text file that a website stores on your computer or mobile device when you visit the site.

First-party cookies are cookies set by the website you're visiting. Only that website can read them. In addition, a website might potentially use external services, which also set their own cookies, known as third-party cookies.

Persistent cookies are cookies saved on your computer and that are not deleted automatically when you quit your browser, unlike a session cookie, which is deleted when you quit your browser.

Every time you visit the PPS website, you will be prompted to accept or refuse cookies.

The purpose of cookies is to enable the website to remember your preferences (such as language, etc.) for a certain period of time or to establish anonymised statistics about the browsing experience on the website.

### **How do we use cookies?**

The PPS website uses first-party cookies that are set and controlled by PPS, not by any external organisation.

The two types of first-party cookie we use are to:

1. Visitor preferences

These are set by us and only we can read them. They remember if you have agreed to (or refused) this site's cookie policy.

2. Analytics

We use these cookies purely for internal research on how we can improve the service we provide for all our users. The cookies simply assess how you interact with our website, the total time you spend on our website, the time you spend on each page and in what order those pages were visited.

The analytics cookies registered the following information as well:

- The geographic location of the website visitor

- What browser and operating system are being used
- Screen size and whether Flash or Java is installed
- The referring site

All this information is collected from you as an anonymous user (the data gathered does not identify you personally).

Also, this data is not shared with any third parties or used for any other purpose. The anonymised statistics could be shared with contractors working on communication projects under contractual agreement with PPS.

However, you are free to refuse these types of cookies via the cookie banner you'll see on the first page you visit.

Name	Service	Purpose	Cookie type and duration
Cookie consent	Cookie consent	Stores your cookie preferences (so you won't be asked again)	First-party persistent cookie x month
Gtag.js	Corporate web analytics service	Recognises website visitors ( <b>anonymously</b> – no personal information is collected on the user)	First-party persistent cookie x month
Analytics.js	Corporate web analytics service	Identifies the pages viewed by the same user during the same visit ( <b>anonymously</b> – no personal information is collected on the user)	First-party persistent cookie x month

## How can you manage cookies?

You can manage/delete cookies as you wish.

### *Removing cookies from your device*

You can delete all cookies that are already on your device by clearing the browsing cache/history of your browser. This will remove all cookies from all websites you have visited.

Be aware though that you may also lose some saved information (e.g. saved login details, site preferences).

### *Managing site-specific cookies*

For more detailed control over site-specific cookies, check the privacy and cookie settings in your preferred browser

#### *Blocking cookies*

You can set most modern browsers to prevent any cookies being placed on your device, but you may then have to manually adjust some preferences every time you visit the site.