

## Privacy Policy

This Privacy Notice ("**Notice**") describes how the UK business of Wirecard Card Solutions Limited ("**Wirecard**") collects, stores and uses personal information ("**Personal Information**") including information about cardholder customers, contacts, suppliers and job applicants, as well as about visitors to the Wirecard website at [www.wirecard-cardsolutions.com](http://www.wirecard-cardsolutions.com) ("our site").

In this Notice, we use the terms "**we**", "**us**", and "**our**" (and other similar terms) to refer to Wirecard, and "**you**" and "**your**" (and other similar terms) to refer to our cardholder customers, contacts, suppliers, job applicants and site visitors.

This Notice is an important document. We recommend that you read it carefully and print and keep a copy for your future reference. When you deal with Wirecard we will assume you agree to the uses of your Personal Information described in this Notice unless you tell us otherwise in writing.

For data protection purposes, the data controller is Wirecard Card Solutions Limited of Grainger Chambers, 3-5 Hood Street, Newcastle Upon Tyne, United Kingdom NE1 6JQ.

### **(1) How to contact us**

If you have any questions about how we collect, store and use Personal Information, then please contact us using the following contact details:

Write to us at: Data Protection Team, Wirecard Card Solutions Limited, Grainger Chambers, 3-5 Hood Street, Newcastle Upon Tyne, United Kingdom, NE1 6JQ]; or E-mail us at: [WDCSDataPrivacy@wirecard.com](mailto:WDCSDataPrivacy@wirecard.com)

### **(2) What does Wirecard do?**

Wirecard Card Solutions provides card issuing and settlement services and works with "Programme Managers" (the companies that directly contract with customers to provide our pre-paid payment instruments and payment accounts) to bring innovative and customised prepaid & debit card products and services ("cards") to end users of both corporate and private customers.

If you are an end-user of a Wirecard card issued to you by one of our Programme Managers, we Wirecard Solutions Limited will, together with the applicable Programme Manager act as an independent data controller in respect of the Personal Information that we must process about you in connection with our provision of card issuing and settlement services.

### **(3) The Personal Information that we collect**

Depending on how you engage with us, we will collect and process the following data about you:

#### **(a) Information that you provide voluntarily**

- **If you are an employee or other staff member of a Wirecard corporate customer, supplier or partner:** We will use the personal and/or professional contact details, professional title and if necessary identity documents that we ask you to provide for the purposes of carrying out customer due diligence and KYC checks, managing invoicing and/or payments and corresponding with our corporate customer, supplier

and/or partner in connection with the applicable services. We may also keep your contact preferences, such as requests to subscribe to publications that we may circulate from time to time, to receive news about any events we are organising or participating in, or to receive information about Wirecard and the services we provide.

- **If you are a site visitor:** We will use any information that you provide by filling in forms on our site. This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site.
- **If you write to us:** We will keep a record of that correspondence.
- **If you complete any of our surveys:** We will use your responses for research purposes.
- **If you are a job applicant:** We will use your contact details, copies of your job application, curriculum vitae and covering letter, as well as any references provided, for the purposes of processing your application and for general recruitment and selection purposes.

#### **(b) Information that we collect automatically**

- **If you are a Wirecard cardholder customer of one of our Programme Managers:** We will automatically collect information about the transactions that you make using your Wirecard card, your card number, transaction amount transaction date, merchant name and any details about applicable chargebacks in connection with our provision of card issuing and settlement services in relation to the programme.
- **If you make credit card purchases with merchants (such as retailers) that we work with:** We will process the following information: information about you (such as first and last name, address, e-mail address, date of birth, IP address); information about the payment card chosen and your payment information (such as credit card number, payment status); transaction information (such as product, item number, purchase price and similar information); information on current and past transactions by you, to the extent that Wirecard performs a credit check; creditworthiness information obtained from financial information service providers that provide insight into the creditworthiness of you (e.g. enforceable claims against the end customer).
- **If you are a site visitor:** We will collect, store and use certain, limited information relating to your use of the Wirecard site for the purposes of better understanding the types of visitors who browse our site and improving our site offering. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our site, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to our site, where they come from, and what content on our site is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our site to our visitors. Some of this information may be collected using

cookies and similar tracking technology, as explained further under the heading [“Cookies and similar tracking technology”](#) below.

**(c) Information that we obtain from third party sources**

- **If you are a Wirecard cardholder customer of one of our Programme Managers:** we will receive from the applicable Programme Manager your name, address, DOB, email address, mobile number, IP address of sign up location, bank account details, Wirecard card details and any and all other supporting documents that may be required (i.e. including utility bills) for the purposes of carrying out appropriate customer due diligence to enable us to comply with our anti-money laundering and FCA obligations. We may also receive information from you via third party fraud prevention and credit reference agencies or other organisations involved in the support or provision of your card and the associated services.

**(4) How we use your Personal Information**

Depending on how you engage with us, we will use your information for the following purposes:

- **For communication purposes:** We use information and preferences to communicate with our Programme Managers and suppliers and to send publications that we may circulate from time to time, news about any events we are organising or participating in, and/or other information about Wirecard and the services that we provide. We will only contact you in accordance with the contact preferences that you have specified (which may include e-mail) and will not send you marketing communications where you have told us you do not wish to receive these. You can specify your contact preferences when registering online to receive communications from us (for example, through the Wirecard site) or by subsequently advising us of your contact preferences using the contact details provided above.
- **To provide our card services to Programme Managers (our customers) and cardholders engaged by our Programme Managers:** We will use Personal Information to provide our services to our Programme Managers, for example, opening, administering and running cardholder card accounts (including using mobile phone numbers and email addresses to provide balance updates and transaction alerts in the manner requested by our customers), facilitating settlement and reconciliation of the cardholders accounts, carrying out due diligence checks and transaction monitoring for compliance with FCA obligations and VISA and Mastercard scheme requirements and dealing with any cardholder customer enquiries.
- **To process your payment for merchants (such as retailers) that we work with:** We will process your information for the purposes of fulfilling payment processing services (including assignment and collection of claims) for the merchants we work with.
- **To receive services from our suppliers:** We will use our suppliers Personal Information to receive their services from them. Please note that we will assume, unless our suppliers instruct us otherwise in writing, that we may use and disclose their Personal Information in such manner as we believe is reasonably necessary to receive and to review the provision of those services from them.

- **To collect our charges or costs in connection with other legal enforcement:** We will use Personal Information to agree payment arrangements with you, and to collect our fees and costs owing to us in connection with legal enforcement.
- **To manage our supplier relationships:** We will use our suppliers Personal Information to agree payment arrangements with our suppliers, and to make payments to them.
- **For recruitment and selection purposes:** If you apply for a position with Wirecard, we will use your Personal Information to process your job application and for general recruitment and selection purposes. If you are successfully recruited, the Personal Information you provide will be stored on your personnel file.
- **For monitoring and quality assurance purposes.** We may monitor telephone and e-mail communications between our employees and third parties for the purpose of quality assurance and training or as otherwise permitted by law.
- **For site analytics purposes:** We may collect, store and use certain, limited information relating to your use of our site for the purposes of better understanding the types of visitors who browse our site and improving our site offering. Other than information you choose to submit voluntarily to receive communications from Wirecard (as described in the "If you are a contact of Wirecard" bullet above), the information we collect about site visitors does not enable any visitor to be individually identified, is processed only in anonymised, aggregated form, and will only be used for site analytics purposes as described in our [Cookies Notice](#).

#### (5) Your data protection rights

You have the following data protection rights, subject to certain exemptions and satisfying certain conditions:

- If you wish, to **access, correct, update or request deletion** of your Personal Information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading above [\[WDCSDataPrivacy@wirecard.com\]](mailto:WDCSDataPrivacy@wirecard.com).
- In addition, you can **object to processing** of your Personal Information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading above [\[WDCSDataPrivacy@wirecard.com\]](mailto:WDCSDataPrivacy@wirecard.com).
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading above [\[WDCSDataPrivacy@wirecard.com\]](mailto:WDCSDataPrivacy@wirecard.com).
- Similarly, if we have collected and process your Personal Information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading above [\[WDCSDataPrivacy@wirecard.com\]](mailto:WDCSDataPrivacy@wirecard.com).

- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## **(6) Who we share your Personal Information with**

We may disclose your Personal Information with the following categories of recipients:

- **Group companies, business partners (i.e. our Programme Managers), service providers and other affiliated third parties:** who provide data processing services to us (for example, to support the delivery of our site or due diligence services), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. A list of our current group companies is available [here](#) and a description of the categories of the current service providers we work with is available [here](#).
- **To any competent law enforcement body, regulatory, government agency, court or other third party:** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- **To an actual or potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice.
- **To any other person with your consent** to the disclosure.

## **(7) Legal basis for processing Personal Information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only

- (i) where the processing is in our legitimate interests and not overridden by your rights,
- (ii) where processing is necessary to fulfil a contract with you (such as your pre-paid card contract if applicable),
- (iii) where processing is necessary to fulfil a contract with merchants that we work with, or
- (iv) we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (e.g. our legal obligation to carry out appropriate customer due diligence and anti-money laundering checks).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or

preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading above [[WDCSDataPrivacy@wirecard.com](mailto:WDCSDataPrivacy@wirecard.com)].

#### **(8) Cookies and similar tracking technology**

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our [Cookie Statement](#).

#### **(9) International transfers of Personal Information**

As described above, from time to time, Wirecard may need to transfer your Personal Information to business partners, service providers and other Wirecard offices that are located in territories outside of the European Economic Area ("EEA").

For example, as well as described above in respect of Wirecard offices in Germany, we may provide customers' card and associated accounts and services from centres such as the USA, Dubai and India and we may process payments through other organisations such as banks, payment processors, card networks and payment schemes. Personal Information transferred out of the EEA are safeguarded under the terms of the European Commission's Standard Contractual Clauses.

Please note that the legal regimes of some territories outside of the EEA do not always offer the same standard of data protection as those inside the EEA, although we will ensure that your Personal Information is only ever treated in accordance with this Notice and, if you are a customer, our terms and conditions.

#### **(10) How we look after your Personal Information**

We have in place what we believe to be appropriate technical and organisational security measures to protect your Personal Information against unauthorised or unlawful use, and against accidental loss, damage or destruction. We put in place strict confidentiality agreements (including appropriate data protection obligations) with our third party service providers. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

If you or others on your behalf give us any Personal Information about another person, you take full responsibility for complying with any relevant data protection laws which apply to the provision of that information to us, and our use of it as explained in this Notice.

#### **(11) Data retention**

We retain Personal Information where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **(12) Updates to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.