

## Privacy Policy for the Paynovatio supported Visa Platinum Card

Last updated on 08.02.2019

### 1. General

Wirecard Card Solutions Ltd. ("Wirecard" or "we") respects users' right to privacy. This Privacy Policy describes how Wirecard collects, stores, shares and uses personal data about you, and how you can exercise your privacy rights. This Privacy Policy only applies to personal data that we process in relation to your Paynovatio supported Wirecard Debit Card and the related account (hereinafter collectively referred to as the **Visa Platinum Card**) which you have signed up to under the general terms and conditions at [www.payplatinum.eu](http://www.payplatinum.eu) (the "Site").

### 2. How to contact us

The data controller of your personal data is Wirecard Card Solutions Ltd., Grainger Chambers, 3-5 Hood Street, Newcastle upon Tyne, NE1.

If you have any questions about how we collect, store and use your personal information or would like a copy of the information we hold about you, then please contact us. You can

- either write to us at the above address
- or e-mail us at: [cards.info@wirecard.com](mailto:cards.info@wirecard.com)

### 3. What does Wirecard do?

Wirecard offers its customers products and services relating to electronic payment transactions. The objective is to allow companies and consumers worldwide to process electronic transactions safely and smoothly. Security and the protection of personal data is one of the most important aspects in the context of handling and processing of payments. This is why Wirecard places particular emphasis on high data protection standards. For more information about Wirecard or Wirecard in particular, please see our website at [www.wirecard.com](http://www.wirecard.com).

Our cooperation with Paynovatio is aiming at providing you with the **Visa Platinum Card** which enables you to carry out card payments through e-commerce and point-of-service (POS) channels, as well as at ATM terminals. Wirecard is responsible as the issuing financial institution for providing the **Visa Platinum Card**; whereas Paynovatio provides the Paynovatio service including carrying out the customer verification and providing initial customer services support.

### What personal data does Wirecard process and why?

#### 3.1 Information that you provide by creating a **Visa Platinum Card**

To register for a **Visa Platinum Card** you first need to share the following types of personal data with us so that we can set up your **Visa Platinum Card** account and verify your identity:

- Full name;
- Residential address;
- Contact details – your e-mail address and mobile phone number;
- Date and place of birth; and

- Nationality.

### 3.2 Information that we collect when you visit the Site

A word about cookies

- Our Site uses cookies, which are small files placed on your internet browser when you visit the Site. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- Where we use cookies on the Site, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of the Site or to use all the functionality provided through the Site.
- For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies policy here <https://www.wirecard.com/privacy-protection/cookies/>.

### 3.3 Further data processing

Furthermore Wirecard processes your personal data:

- to provide the Wirecard services to you in connection with your **Visa Platinum Card** and to fulfill your transaction requests, we process details about how you use and manage your **Visa Platinum Card** and account, as well as details of transactions or payments you make using the **Visa Platinum Card** services.
- to check your identity and verify your address as required by law as well as to check against sanction lists, all as required by law, to assess your application, to prevent or detect fraud, record any suspicious or fraudulent behaviour or our suspicions about false or inaccurate information, we share your information with credit reference agencies or other organizations involved in the support or provision of the **Visa Platinum Card** services.
- to deal with any queries or problems you have in relation to your **Visa Platinum Card** account or card including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you;
- to communicate with you via e-mail when you contact us to report a problem or query relating to your **Visa Platinum Card** account or card.

Wirecard has commissioned Paynovatio with the initial process of verifying your identity which is required by law (the KYC – "Know Your Customer" – verification process). Specifically, Paynovatio receives the data specified in paragraph 3.1 for the KYC verification process. Paynovatio handles the KYC verification process according to the domestic laws of the Czech Republic which apply to your **Visa Platinum Card**.

### 3.4 Legal basis for processing personal data

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it. We will collect personal data from you where we need it to perform a contract with you. That is to provide you with the **Visa Platinum Card** and to deal with any issues occurring related to these products. Besides, it is in our legitimate interest to process your personal data to carry out credit checks, check your identity, for fraud prevention, for risk assessment. Further we process your personal data if required to comply with statutory obligations or court or governmental orders.

### 4.4 Sharing of personal data with Paynovatio

Wirecard shares certain personal information with Paynovatio, who operate the Paynovatio service. This information includes:

- information we receive from you when you register for a **Visa Platinum Card** and account so that Paynovatio may verify your identity;
- your transaction history; and
- information we collect about how you use and manage your **Visa Platinum Card** and account.

We share that information with Paynovatio so that they can provide their Paynovatio services to you and deal with any queries or problems you have in relation to your **Visa Platinum Card** or account, help prevent or detect fraud, record any suspicious or fraudulent behaviour or our suspicions about false or inaccurate information.

### **3.5 Wirecard shares your personal data with the following third parties**

- Other Wirecard companies: to provide you with our services. Specifically, any payment transaction is processed by Wirecard Processing FZ-LLC in Dubai. Wirecard services use and rely on the back-office processing and storage services of German affiliate companies Wirecard Technologies GmbH and Wirecard Issuing Technologies GmbH and their systems and servers based in Germany. Customer support is managed from Germany by Wirecard Communication Services GmbH. Our administration and black list and fraud checks are supported by Wirecard UK and Ireland Limited in Dublin.
- Card manufacturers: to be able to provide you with an actual physical card.
- Shipping companies: to send you the **Visa Platinum Card**.
- Credit-checking agencies or fraud prevention agencies and other organisations: to check all personal information given by you and to perform a search of your credit file in order to verify your identity.
- Card network and payment scheme (Visa): to provide the **Visa Platinum Card** and associated services to you.
- Service providers and other affiliated third parties: to enable us to provide our services to you.
- Law enforcement agencies, regulatory organisations, courts or other public authorities: to comply with law or regulation or in connection with proposed or actual legal proceedings or regulatory actions.

## **4. How we look after your personal information**

Wirecard has appropriate technical and organisational security measures in place 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 data protection obligations) with our third party service providers.

## **5. International data transfers (including to outsourced service providers)**

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"). Specifically, our website servers are located in Germany. However, we may support the **Visa Platinum Card** and associated services from centres such as the USA and India and we may process payments through other organisations such as banks, payment processors, card networks and payment schemes which are located

outside of the EEA. However, we have appropriate measures in place providing an adequate level of protection. In the case of processing your data outside the EEA, we will ensure an adequate level of protection through Privacy Shield certification of the EU Standard Contractual Clauses.

## **6. Data retention**

When Wirecard does not have any legal basis to process your personal data it will be deleted.

Wirecard retains personal data collected from you where we have an ongoing legitimate business need to do so to provide you with a service you have requested or to comply with statutory retention obligations e.g. under tax or accounting law.

## **7. Your data protection rights**

If you wish to access, correct, update or request deletion of your personal data, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading above.

You can object to processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading above.

Similarly, if we have collected and process your personal data 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 data conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.