

# Exacard Privacy Policy

**This privacy policy sets out details of how we may process your personal data.**

Transact Network Limited (TNL) is committed to safeguarding the privacy of your information. References to “we”, “us” and similar are to TNL as the data controller for your payment products and services. By “your data”, “your personal data”, and “your information” we mean any information about you, which you or third parties provide to us.

## **Use of Your Data**

If you apply for services or an account with us and once you are a registered customer with an account with us, we collect, use, share and store personal and financial information about you (“your information”). This may include information you provide relating to your health and lifestyle. This includes information which we obtain from you or from third parties (such as employers, joint account holders, credit reference agencies and fraud prevention agencies or other similar organisations - who may check the information against any particulars on the Electoral Register and any other databases) and information that we learn from the way you use and manage your account(s), from the transactions you make (such as the date, amount, currency and the name) and the type of supplier (e.g. supermarket stores, retailers) and from the payments which are made to/from your account.

Where you provide personal and financial information relating to others (e.g. dependants, joint account holders) for the purpose of opening or administering your account you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it in accordance with this agreement.

TNL and its subsidiary companies (“Data Group”) will use your information to manage your account(s), give you statements and provide our services, for assessment and analysis (including credit and/or behaviour scoring, market and product analysis and market research), to prevent and detect fraud, money laundering and other crime, carry out regulatory checks and meet our obligations to any relevant regulatory authority, and to develop and improve our services to you and other customers and protect our interests.

We may also give information about you and how you manage your account to the following partners (“Partners”):

- companies and organisations who provide a service to us or are acting as our agents (including their sub-contractors), on the understanding that they will keep the information confidential and subject to the same legal requirements regarding privacy and security;
- companies and organisations that assist us in processing transactions you make (including but not limited to payment processing service providers) and in providing value added services that you have requested;
- your advisers (including but not limited to accountants, lawyers, financial advisers or other professional advisers) where authorised by you and to any other person notified by you as authorised to give instructions or to use the account or products or services on your behalf;
- in order to make or receive some payments, the details of the payment (including information relating to those involved in the payment) may be received from or sent abroad, where it could be accessible by overseas regulators and authorities in connection with their legitimate duties (e.g. the prevention of crime). In instructing us to make payments you agree to this on behalf of yourself and others involved in your payments;

- anyone to whom we lawfully transfer or may transfer our rights and duties under this agreement;
- any third party as a result of any restructure, sale or acquisition of any company within the Data Group, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us.

Our Partners may be located outside of the European Economic Area (“EEA”). Our contractual arrangements with these Partners ensure they agree to apply the same levels of protection as we are required to apply to your information and, where appropriate, to use your information strictly in accordance with our instructions. The purpose of the use of Partners includes the provision of: customer care/help desk facilities; research and statistical analysis; credit verification and scoring; technical support in the performance of our services; transaction processing; fraud screening and dealing with chargebacks and other system reconciliations.

Other than as specified herein, we will keep information about you confidential unless we have a duty to disclose it or law or regulation allows us to do so for legitimate business purposes. We will retain information about you after the closure of your account, or if your application is declined or abandoned, for as long as permitted or required for legal, regulatory, fraud and other financial crime prevention purposes and for lawful permitted business purposes.

### **Anti-terrorism**

In case of cross-border transaction inside or outside the EEA we may provide your personal data to the Society for Worldwide Interbank Financial Telecommunications (SWIFT) and the financial institution of the recipient. SWIFT may store such personal data in the EEA and the USA for a limited period of time. US authorities may have access to your personal data for the purposes of prevention of international terrorism.

### **Marketing**

You will always have the ability to opt out of any promotional contact or usage of your personal data for promotional purposes. Your information will not be given or sold to any outside organisation for use in marketing without your consent. We will use the various forms of communication (including electronic communication) provided by you to keep you informed about products and services that may be of interest to you. Where you have provided specific consent communications may include promotions from relevant third parties. You may tell us at any time if you do not wish to receive marketing communications from us and/or third parties online by responding to the marketing communication, using your online account or by contacting us at [optout@transactnetwork.com](mailto:optout@transactnetwork.com) and advising us of the types of communication that you no longer wish to receive.

### **Consent**

By registering your details with us, you consent to our using and/or disclosing your personal data for the purposes set out above.

### **Use of Cookies**

To optimise your experience at our website we use cookies – cookies are a piece of information stored on your PC about your visits recording your personal online preferences. You may elect to disable cookies by selecting the corresponding option in your web browser. As a result, some of the services may not operate the same as if the cookie function is enabled.

### **Managing Your Data**

As a registered customer, you have the ability to log onto your account using your username and password. Once you have logged in, you have the ability and obligation to maintain the accuracy of your personal data. If you update your data, you authorise us to re- verify the accuracy of this personal data. Keeping your account current will assist us in compliance matters and ensure you more accurate access to your account.

You are entitled to see the information held about you by us and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us. You can request the deletion of any of your personal data. Upon such request, we will delete or suspend access to such data to the extent permitted by law. You can request any changes or deletion of your personal data kept by us by contacting [compliance@transactnetwork.com](mailto:compliance@transactnetwork.com)

### **Security and Data Retention**

We secure your personal data and protect it from unauthorised access, use or disclosure. All personal information is transmitted to other Web sites through the use of Secure Socket Layer (SSL) encrypted protection. We will retain your information for as long as is reasonably permitted for business purposes and subject to any legal requirements or restrictions on data storage and retention.

### **Changes to Privacy Policy**

We may change this policy from time to time in order to keep up with business demands and privacy regulation. We will inform you about any such changes.

### **Contact Us**

Transact Network Limited is a registered company in Gibraltar, Company registration No. 96561. Authorised and regulated as an e-money issuer by the Gibraltar Financial Services Commission. Registered Office: Suite 51, Victoria House, 26 Main Street, Gibraltar. If you would like to contact us please do so via email at [help@transactnetwork.com](mailto:help@transactnetwork.com). If you have a question specifically regarding Data Protection please direct your inquiry to our Compliance Officer via email with the Subject Line "Data Protection" to [compliance@transactnetwork.com](mailto:compliance@transactnetwork.com)