

# Privacy policy

Effective Date: 25th May 2018.

Mastercard Prepaid Management Services Limited, its affiliates and other entities within the Mastercard's group of companies ("Mastercard", "we", "us", or "our") respect your privacy.

This Privacy Notice applies to the processing of Personal Information collected in the context of Mastercard Prepaid Management Services (the "Services"). This Privacy Notice does not cover the collection and use of your Personal Information by Mastercard in the context of other programmes, by third parties on other Mastercard branded websites, by your Mastercard Card issuers (e.g., your bank), or any other information or communications that may reference Mastercard outside of the Services.

This Privacy Notice describes the types of Personal Information we collect in connection with the Services, the purposes for which we collect that Personal Information, the other parties with whom we may share it and the measures we take to protect the security of the data. It also tells you about your rights and choices with respect to your Personal Information, and how you can reach us to update your contact information or get answers to questions you may have about our privacy practices.

Your visit to the Mastercard Prepaid Management Services' website and your participation in the programme is subject to this Privacy Notice, to the Cookie Notice and to our Terms and Conditions. For more information about Mastercard's privacy practices, please visit Mastercard's Global Privacy Notice at <https://www.mastercard.us/en-us/about-mastercard/what-we-do/privacy.html>

## 1. Personal Information We May Collect

We May Collect the following Personal Information:

- Contact information and government identification (such as driver's license and passport information).
- Username, password, identification number or access code.
- Payment card information and financial information.
- Content you provide, such as photographs, articles and comments.
- Geo-location data.
- Information collected via automated means.
- Other information (such as shopping behaviour and preferences, language preference, age, date of birth, gender and family status).

For the purpose of this Privacy Notice, "Personal Information" means any information relating to an identified or identifiable individual. In connection with the Services, we obtain Personal Information relating to you from various sources described below.

Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal

Information when requested, you may not be able to benefit from the Services if that information is necessary to provide you with the service or if we are legally required to collect it.

a. Personal Information Provided by You or by Financial Institutions, Distributors or other Service Providers

In connection with the Services, we ask you to provide certain Personal Information when you create an account, order a prepaid product or service, participate in an offer or promotion, or submit information on our websites. We may also obtain Personal Information directly from you in connection with an actual or potential business or employment relationship with us. In addition, we may obtain Personal Information about you from financial institutions, distributors and other service providers in our role as a prepaid programme manager and provider of related services.

We may collect the following types of Personal Information relating to you from the sources described above:

- Contact information (such as name, postal or e-mail address, and telephone or fax number).
- Government Identification (such as driver's license or passport information).
- Business contact information (such as job title, department and name of organization).
- Username and password.
- Payment card information.
- Financial information (such as financial account information and information that may be contained in a consumer report).
- Identification number or access code.
- Content you provide (such as photographs, articles, and comments).
- Geo-location data.
- Other information (such as shopping behaviour and preferences, language preference, age, date of birth, gender, and family status).

b. Personal Information Obtained from Your Interaction with the Services

When you use the Services, we may collect certain information by automated means via cookies and similar technologies, such as IP address, MAC address, device ID, location data, information on actions taken on our website, dates and times of actions, and other mobile trackers. We use this information to improve the Services by assessing how many users access or use our service, which content, products, and features of our service most interest our visitors, what types of offers our customers like to see, and how our service performs from a technical point of view. For more information, please read our [Cookie Notice](#).

c. Tailored content and services

If you sign up for the Services, we may use your Personal Information, such as your shopping behaviour and preferences, as well as information obtained from your interaction with our website or publicly available information, to better understand your preferences and improve the Services. We may also use this information to provide you with tailored content and the most relevant offers, content, or messages. We will not subject you to a decision based solely on

automated processing that produces legal effects concerning you or similarly significantly affects you.

## **2. How We May Use Your Personal Information**

We may use Your Personal Information to:

- Communicate with you.
- Provide, improve, and develop the Services.
- Send you marketing materials and provide you with personalised content.
- Protect against fraud and ensure safety and security.
- Enforce our Terms and Conditions and comply with our legal obligations.

We may use the Personal Information we obtain about you to:

- Create and manage your online account, verify your identity, provide our services, and respond to your enquiries.
- Process your prepaid card transactions (including authorization, clearing, settlement, chargebacks and other related dispute resolution activities) in our role as a prepaid programme manager and provider of related services
- Distribute prepaid cards to you through our distributor network.
- Protect against and prevent fraud, unauthorized transactions, claims and other liabilities, and manage risk exposure and franchise quality.
- Manage our prepaid card inventory.
- Provide, administer and communicate with you about products, services and promotions.
- Send marketing communications about you products, services, offers, programmes and promotions of Mastercard, its issuers, acquirers, retailers and partners (including contests, sweepstakes and any other marketing activities).
- Provide you with personalized services and recommendations. For example, we may suggest products or other special marketing activities that we think would be of particular interest to you based on your interaction with our website, your online behaviour and other Personal Information we may obtain about you.
- Operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our advertising; analysing our products, services and websites; performing and producing data reports, including data anonymisation; facilitating the functionality of our websites; and performing accounting, auditing, billing, reconciliation and collection activities).
- Enforce our Terms and Conditions.
- Comply with applicable legal requirements, industry standards and our policies.
- Support you in any dispute arising from a transaction. Consider you for employment roles or contact you in the course of a recruitment process.
- Use the information in other ways for which we provide specific notice at the time of collection.

We will only process your Personal Information for the above purposes when we have a valid legal ground for the processing, including if:

- You consented to the use of your Personal Information. For example, we may seek to obtain your consent for our uses of cookies or similar technologies, to send you marketing communications or personalize our offerings.
- We need your Personal Information to provide you with products and services, or to respond to your inquiries.
- The processing is necessary for compliance with a legal obligation such as to prevent and monitor fraud in payment transactions.

- We, or a third party, have a legitimate interest in using your Personal Information, such as to ensure and improve the safety, security, and performance of our products and services, to protect against and prevent fraud, to anonymize Personal Information and carry out data analyses.

### **3. How We Share Your Personal Information**

We may share Personal Information with:

- Mastercard's headquarters in the U.S., our affiliates and other entities within Mastercard's group of companies.
- Our service providers acting on our behalf.
- Other participants in the payment ecosystem, including financial institutions, entities that assist with payment card fraud prevention, and distributors.
- Credit reference agencies and fraud prevention agencies.
- Other third parties for fraud monitoring and prevention purposes, or other lawful purposes.
- Third parties in the event of a sale or transfer of our business or assets.

We do not share or otherwise disclose Personal Information we collect about you, except as described in this Privacy Notice or otherwise disclosed to you at the time the data is collected. We may share the Personal Information we collect with our headquarters and affiliates, including Mastercard International.

We may share the Personal Information we collect with financial institutions that issue payment cards, entities that assist with payment card fraud prevention, (where relevant) our customers (e.g. providers of corporate card programmes), or distributors (e.g. travel agents offering prepaid cards). For example, we provide financial institutions with information about their cardholders' transactions that we process.

We may share your Personal Information with credit reference agencies and fraud prevention agencies (i) to make enquiries when you ask for a Cash Passport or any of our services or to assist us in managing the Cash Passport; (ii) to share information about you and how you manage the Cash Passport; or (iii) if you give us false or inaccurate information or we suspect fraud. These agencies keep a record of our enquiries (whether or not you proceed with your application, and whether or not your application is successful) and may record, use and give out information we give them to lenders, insurers and other organizations to make assessments on you and members of your household, and to assist with identity verification, for debt tracing, and to prevent fraud and money laundering.

We also may share Personal Information with our service providers who perform services on our behalf and in relation to the purposes described in this Privacy Notice. We require these service providers by contract to only process Personal Information in accordance with our instructions and as necessary to perform services on our behalf or comply with legal requirements. We also require them to safeguard the security and confidentiality of the Personal Information they process on our behalf by implementing appropriate technical and organisational security measures and confidentiality obligations binding employees accessing Personal Information.

We also may disclose data about you: (i) if we are required to do so by law or legal process, (ii) in response to a request from a court, law enforcement authorities, or government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

We also reserve the right to transfer Personal Information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use Personal Information you have provided to us in a manner that is consistent with this Privacy Notice. Following such a sale or transfer, you may contact the entity to which we transferred your Personal Information with any enquiries concerning the processing of that information.

#### **4. Your Rights and Choices**

Subject to applicable law, you have the right to:

- Access your Personal Information, rectify it, restrict or object to its processing, or request its deletion.
- Receive the Personal Information you provided to us to transmit it to another company.
- Withdraw any consent provided.
- Where applicable, lodge a complaint with your Supervisory Authority.

If you are located in the EEA or Switzerland, you can exercise your rights via submitting a request as described in the “How to Contact Us” section.

Subject to applicable law, you have the right to:

- Request access to and receive information about the Personal Information we maintain about you, to update and correct inaccuracies in your Personal Information, to restrict or to object to the processing of your Personal Information, to have the information anonymized or deleted, as appropriate, or to exercise your right to data portability to easily transfer information to another company. In addition, you may also have the right to lodge a complaint with a supervisory authority, including in your country of residence, place of work or where an incident took place.
- Withdraw any consent you previously provided to us regarding the processing of your Personal Information, at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before your consent withdrawal.
- You may opt out from receiving marketing communications by clicking on the unsubscribe link contained in such communications.

Those rights may be limited in some circumstances by local law requirements.

If you are located in the EEA or Switzerland, you can easily submit a request to exercise your rights, update your preferences, ask us to remove your information from our mailing lists or delete your account by contacting us as specified in the “How to Contact Us” section below.

Subject to applicable law, you may also have the option to withdraw your consent by using the unsubscribe link inserted in our communications.

#### **5. How We Protect Your Personal Information**

We maintain appropriate security safeguards to protect your Personal Information and only retain it for a limited period of time.

We maintain appropriate administrative, technical and physical safeguards to protect Personal Information against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the

Personal Information in our possession. We restrict access to Personal Information about you to those employees who need to know that information to provide products or services to you. We use SSL encryption on a number of our websites from which we transfer certain Personal Information.

We take reasonable steps to maintain the accuracy of your Personal Information for as long as it is being used by us for the purposes set out in this Privacy Notice, and you play an active role in keeping us up-to-date. Prompt notification of any changes, for example to your postal or e-mail address or telephone number, will help us provide you with the best possible service. Should you discover, upon review of your Personal Information, that amendments are required, please advise us. We will use our best efforts to advise others of any important amendments to your Personal Information which we may have disclosed to them.

We also take measures to delete your Personal Information or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it in the context of the Services or when you request their deletion, unless we are required by law to keep the information for a longer period. We complete periodic reviews of our databases, and have established specific time limits for data deletion, taking into account the type of services provided in the context of Mastercard's Prepaid Management Services, the length of the customer relationship and any consent given by you to retain such information, possible re-enrolment with the Services, and any legal requirements we are subject to with respect to your Personal Information, including mandatory retention periods and the statute of limitations.

## **6. Data Transfers**

We may transfer your Personal Information outside of the EEA, including to the United States, in compliance with our Binding Corporate Rules and other data transfer mechanisms.

Mastercard is a global business. We may transfer or disclose Personal Information we collect about you to recipients in countries other than your country, including to the United States where our global headquarters are located. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer or disclose your Personal Information to other countries, we will protect that information as described in this Privacy Notice.

We comply with applicable legal requirements providing adequate safeguards for the transfer of Personal Information to countries other than the country where you are located. In particular, we have established and implemented a set of Binding Corporate Rules ("BCRs") that have been recognized by EEA data protection authorities as providing an adequate level of protection to the Personal Information we process globally. A copy of our BCRs is available [here](#). We may also transfer Personal Information to countries for which adequacy decisions have been issued, use contractual protections for the transfer of Personal Information to third parties, such as the European Commission's Standard Contractual Clauses, or rely on third parties' certification to the *EU-U.S.* or *Swiss-U.S. Privacy Shield* Frameworks where applicable. You may contact us as specified in the "How to Contact Us" section below to obtain a copy of the safeguards we use to transfer Personal Information outside of the EEA.

## **7. Features and Links to Other Websites**

You may choose to use certain features for which we partner with other entities that operate independently from Mastercard.

You may choose to use certain features for which we partner with other entities or participating merchants, or click on links to other websites for your convenience and information. These features, which may include social networking tools, may operate independently from Mastercard. They may have their own privacy notices or policies, which we strongly suggest you review. To the extent any features or linked websites you visit are not owned or operated by Mastercard, we are not responsible for the sites' content, any use of the sites, or the privacy practices of the sites.

## **8. Updates to This Privacy Notice**

This Privacy Notice may be updated periodically to reflect changes in our privacy practices.

This Privacy Notice may be updated periodically to reflect changes in our Personal Information practices. We will notify you of any significant changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated. If we update this Privacy Notice, in certain circumstances, we may seek your consent.

## **9. How to Contact Us**

You can easily submit a request to exercise your rights or share any questions, comments, or complaints about this Privacy Notice or our privacy practices by emailing us at [privacyanddataprotection@mastercard.com](mailto:privacyanddataprotection@mastercard.com) or by contacting us as specified in the "Learn more" section below.

Mastercard Prepaid Management Services Limited is the entity responsible for the processing of your Personal Information.

You can easily submit a request to exercise your rights or share any questions, comments, or complaints about this Privacy Notice or our privacy practices by e-mailing us at [privacyanddataprotection@mastercard.com](mailto:privacyanddataprotection@mastercard.com), or by writing to us at:

Mastercard Prepaid Management Services Limited  
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PE7 8FJ  
England

or

Data Protection Officer  
Mastercard Europe SA  
Chaussée de Tervuren 198A  
B-1410 Waterloo  
Belgium

For more information on Mastercard's privacy practices in other contexts, please refer to our Global Privacy Notice available at <https://www.mastercard.us/en-us/about-mastercard/what-we-do/privacy.html>.

For all other enquiries about your Mastercard card and your purchase, you must contact your issuing bank or the participating merchant. More information about how to contact them can be found on their respective websites.