



## **Prepay Solutions Privacy Policy – Applicable to Cards issued by PPS for Allpay**

Prepay Technologies Ltd, trading as PrePay Solutions (“PPS”, “Our” and “We”) is a company registered in England and Wales with number 04008083 and a registered office at 6th Floor, 3 Sheldon Square, Paddington, London, W2 6HY, United Kingdom. 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). This Privacy Policy is only applicable to E-Money Prepaid Cards issued by Prepay Solutions for Allpay. It does not apply to any cards which are not issued by PPS but are offered by Allpay.

PPS is the Data Controller in relation to your Card and all necessary activities relating to the operation of the Card: 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).

Allpay is also a separate Data Controller.

You may be the Customer or you may be a person that has been provided with a Card by the Customer.

### **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 your contract with PPS and for the issue and operation of Cards and is necessary for compliance with legal obligations applicable to PPS. PPS does not use your personal information for marketing purposes and will not share your information with third parties for marketing purposes.

### **Categories of personal information and collection**

<b>Type of personal information</b>	<b>Description</b>
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
Card and Transactional Data	Details about use of your Card and payments to and from your accounts with us
Contractual information	Details about the products or services we provide to you
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



Personal information will only be collected directly and voluntarily from you as part of the application process or as a result of transactions relating to your Cards. 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 and IVR and call recording (telephone) suppliers. We also share personal data with Allpay. 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 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 the Information Commissioner's Office (<https://ico.org.uk/>).

#### **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. 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.

#### **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 Card. It could mean that we cancel your Card or services you have with us.