



Privacy Policy for the Tymit Card (Wirecard)

Last updated on 16th of August 2019

1. General

Wirecard Card Solutions ("Wirecard", "we") together with Tymit ("Tymit") 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 the Tymit Card (the "Product"). This Privacy Policy does not describe how Tymit processes personal data; if you wish to know more about this, please refer to their privacy policy. We operate the Product in accordance with the provisions of the European General Data Protection Regulation 2016/679 ("GDPR"), any applicable implementing legislation, and all other provisions with relevance in the area of data protection law.

2. How to contact us

The data controllers of your personal data are WDCS and Tymit as separate controllers.

If you have any questions about how Wirecard collects, stores and uses your personal information or would like a copy of the information it holds about you, then please contact us. You can either write to us at the above address or e-mail us at: WDCSDataPrivacy@wirecard.com.

If you have any questions about how Tymit collects, stores and uses your personal information or would like a copy of the information it holds about you, please visit Tymit's privacy statement for further information.

3. What is the Tymit Card about?

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, please see our website at www.wirecard.com.

The Tymit Card allows customers to make payments using physical payment cards or other transaction means.

4. Collection and Processing of personal data for contract fulfilment

4.1 Information we receive from Tymit

When you register for the Tymit Card, Wirecard receives the following information from Tymit:

- Full name;
- Date of birth;
- Residential address;

- E-mail address and mobile phone number;
- Details of transactions you carry out;
- Information about how you use and manage your Tymit account;

4.2 Purposes of processing

All of this data is received and processed to set up your account, to verify your identity as required by law, and also for credit monitoring, fraud prevention, marketing, increasing account limits. Also, we process the above listed personal data to provide you with the Tymit Card, i.e. carry out your transactions and to facilitate payment.

4.3 Transfer of personal data

Wirecard shares your personal data with other Wirecard companies, our service providers and third parties as follows

- Other Wirecard Companies to provide you with our services. Specifically, but without limitation, our services use and rely on the back-office processing and storage services of our German affiliate company Wirecard Technologies GmbH and its systems and servers based in Germany. Access to personal data stored on these servers may also be granted to other Wirecard Companies for the provision of our services, e.g. to Wirecard Communication Services GmbH for customer support services.
- Wirecard being the issuing financial institution of the Tymit Card is required by law to verify your identity (KYC - Know Your Customer - Process). Wirecard has commissioned an external service provider, with that KYC process. Specifically, the external service provider will ask for the user data enlisted above and additionally for
 - Place of birth;
 - ID Details (number, expiry date, issuing date, country and respective government agency);
 - Residential details.

The external provider will process all the above enlisted types of data and verify your identity using document upload, a “selfie” photograph and an automated document check enabling you (the end user) to identify yourself.

- Visa as a card network and payment scheme, to provide the Tymit Card;
- 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;
- Selected third parties, who may use your personal information to send you marketing messages, if you have agreed that they may do so;
- CLX, SMS provider in order to provide SMS

4.4 Information you provide when you contact us

We will store the personal data provided by you when you contact us (e.g. name, address, telephone number, e-mail address) in our customer relationship management system. We will use such personal data

- to respond to your contact request;

- in anonymized form to support our internal business objectives, namely data analyses, revisions, the development of new products, improvement of this internet presence, improvement of our services, detection of usage trends and determination of the effectiveness of our advertising campaigns);
- in order to prevent and identify abuse or fraud.

The data collected via the contact form will not be forwarded to third parties.

4.5 Legal basis for processing personal data

Our legal basis for processing the personal data described above is the performance of the contract we have with you for the payment card issued to you. Besides, it is in our legitimate interest to process your personal data to carry out credit checks, check your identity, for fraud prevention and risk assessment purposes. We also need the personal data to deal with any issues that might incur, and to comply with any statutory obligation or court or governmental order.

5. 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.

6. International data transfers (including to outsourced service providers)

Wirecard will transfer, or permits specific access to, your personal information to business partners, service providers and other Wirecard offices that are located in territories outside of the European Economic Area ("EEA"). We may process payments through other organisations such as banks, payment processors, card networks and payment schemes that are located outside of the EEA. However, if we process your personal data outside the EEA, we have in place appropriate measures such as Binding Corporate Rules, Standard Contractual Clauses or EU-US Privacy Shield certifications providing for an adequate level of protection.

7. 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.

8. 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 us at the above e-mail address.

Our data protection officer can be reached under WDCSDataPrivacy@wirecard.com

Tymit's Privacy Policy

1. Privacy Statement

We at Tymit care about your privacy. Therefore, we always collect and process your personal data responsibly and with your privacy in mind. We are committed to ensuring that your personal data is kept safe and we have put in place appropriate technical and other security measures to protect it. This Privacy Policy describes how Tymit LTD ("Tymit") collects and uses your personal data when you use any of Tymit's services (the "Services") and become a customer of ours - for example when you pay with our credit card (the "Tymit Card"), use our Tymit mobile application (the "Tymit App"), or get in touch with us through one of the available communication channels. It also describes your rights in relation to our use of your personal data, and how to exercise them. To make enquiries or exercise any of your rights set out in this Privacy Policy, please contact us at privacy@tymit.com.

This Privacy Notice describes the processing of personal data in all of our Services, and it is important that you read this Privacy Notice before you start using any of them. You should not use the Tymit App or any of our services if you do not accept this Privacy Policy or our Terms of Use.

"We", "our" or "us" means Tymit LTD registered with the United Kingdom's companies register under the companies' house number 10827757, with our main office located at 5 Merchant Square, W2 1AY London, United Kingdom. For the purposes of EU data protection law, we are a data controller in respect of the personal data we receive from you, or otherwise collect about you, and we are responsible for ensuring that we use your personal data in compliance with applicable data protection laws.

2. What information do we collect?

We may hold and use various categories of personal information collected at the start of, and for the duration of your relationship with us. We will limit the collections and processing of these personal data to what is necessary to achieve the purposes identified in this notice.

In some circumstances we may also collect and process certain special categories of information. This is to ensure our services are accessible, to detect and prevent financial crime or to protect vulnerable customers. We will only collect and process special category data with your explicit consent.

Information you give us. You may give us information about yourself when you use one of Tymit's Services, for example when you choose to pay with a Tymit card, contact us, or use the Tymit App. It is

your responsibility to ensure that all information you provide to us is correct, accurate, complete and not misleading.

This information can be:

- Personal Information: personal details including your name, address, phone numbers, email address, date of birth, employment status and home ownership details.
- Payment information including debit card or bank account details.
- Demographic and lifestyle information.
- Information collected from Credit and Fraud Prevention agencies at the point you first enquire about becoming our customer and on an ongoing basis as we manage your credit limits and other aspects of the service.
- Details of any contacts that we have had with you, records of any telephone, email or other communication with you and information collected through customer feedback surveys.
- Special categories of data that you may, at your sole discretion, choose to provide us. This includes information about you which constitutes “*special categories*” of personal data according to EU Regulation 2016/679 (the “GDPR”), including e.g. data revealing religious, political or philosophical beliefs, trade union membership, or any other personal data under the special categories defined by the GDPR. We will never require this type of data from you in order to provide you with our Services. Providing us with this information will be strictly voluntary and based on your explicit consent.
- You may at any time change your profile information such as your contact information and other editable settings. This can be done either in the Tymit App or by contacting us in the contact details provided in Section 14.

Information we collect about you. We may collect the following information about you, either ourselves or via our partners (for example credit and fraud prevention bureaus, and public databases):

- Contact and identification information such as your name, date of birth, national ID number, title, occupation, gender, billing and shipping address, email address, mobile phone number, nationality etc.
- Information about your purchases done with the Tymit Card, including for example merchant names or amounts spent.
- Financial information collected from third parties such as your income, potential credit commitments, negative payment remarks, previous payment and credit acceptance, etc.
- Information about the interaction between you and Tymit on how you use our Services, including information on outstanding and historical debts and your repayment history with Tymit; technical data such as page response times, errors, personal preferences; your interactions with the Tymit customer support, etc. We may record telephone conversations if you call our customer support for security, quality control and training purposes.
- Information about your device, such as IP address, language settings, browser settings, time zone settings, operating system and platform and screen resolution.
- Information from external sanction lists and PEP lists. We may screen your information against lists of persons subject to sanctions and lists of persons who are so called Politically Exposed Persons. These lists include information such as name, date of birth, place of birth, occupation or position and reason for being listed.

Please ensure that all information you provide to us is correct, accurate, complete and not misleading.

3. How do we use personal information?

We may use your information for:

- Processing and completing your application for a Tymit Card.
- Searching Credit Reference Agencies' and Fraud Prevention Agencies' records.
- Making an initial decision regarding your eligibility and setting your credit line limits.
- Authorising payments and preventing fraudulent transactions.
- Communicating effectively with you when applying for, agreeing to and undertaking the Tymit Card contract, effectively answering and managing any questions, concerns or complaints you may have through all necessary channels.
- Updating our records and maintaining your user account with us.
- to monitor, review and improve the content and appearance of our website, to ensure that content from our website is presented in the most effective manner for you;
- to maintain and develop our business systems, including without limitation, testing and upgrading them;
- Recovering any debt you owe us.
- Comply with our legal and regulatory requirements and for any other specific purpose which we notify you of at the time your personal information is collected.
- Understanding our customers' needs better, if you give us your permission of retaining the information you have provided us to analyse customer trends and behaviour.

If you decide to join Tymit, in order to be able to provide you the Service, we might need to process your personal data for the purposes listed below and based on the legal bases stated for each respective purpose established by UK's Data Protection law.

4. Who might we share personal data with?

We use third parties to help us perform or improve a range of our business processes so that we can carry on the activities described above. This means that we may have to share your information with third parties and/or they may have to share your information with us. These third parties may include (but are not limited to):

- Credit reference and fraud prevention agencies.
- Our regulators or government authorities, for example the Financial Conduct Authority, the Financial Ombudsman Service and the police.
- Collection agencies and lawyers to help us collect any money owed to us.
- Third party service providers to support the running of our business: e.g. data storage, transfer or processing services.
- Third parties to help us understand, improve and market our products.
- Retailers from whom you've purchased goods or services using our card.

Our VISA credit cards are issued by Wirecard Bank (Wirecard), a fully licensed bank based in Germany within the Wirecard Group. We share information about you and your purchases when using the applicable card with Wirecard, VISA, and payment partners of VISA through the VISA payment scheme, as necessary to carry out the card transactions, to prevent fraud, and follow applicable rules. If you renew your Tymit Card or receive a new one, we will transfer this information to Wirecard and VISA, in order for them to update its partners with which you have stored your card (for example for recurring transactions). You can refer to our privacy policy with Wirecard in the next section of this document.

Furthermore, if you add your Tymit Card to a digital wallet, we may need to share your data with the digital wallet provider in line with that provider's privacy notice.

5. How do we work with Credit Reference Agencies?

To process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). Where you take services from us, we may also make periodic searches at CRAs to manage your account with us. To do this, we will supply your personal information to CRAs, and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

This information will be used for:

- Assessing your creditworthiness and whether you can afford to take the product.
- Verifying the accuracy of the data you have provided to us.
- Preventing criminal activity, fraud and money laundering.
- Managing your account(s).
- Tracing and recovering debts.
- Ensuring any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will

remain on your and their files until such time as you or your partner successfully file for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at <https://www.experian.co.uk/crain>. CRAIN is also accessible from each of the three CRAs.

TransUnion: <https://www.transunion.co.uk/crain>

Experian: <https://www.experian.co.uk/crain>

Equifax: <https://www.equifax.co.uk/crain>

Where we share personal data about you with CIFAS, it will process the data in accordance with its Fair Processing Notice, a copy of which can be found here: <https://www.cifas.org.uk/fpn>.

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found here: <https://www.cifas.org.uk/fpn>.

6. How do we keep your information safe?

We at Tymit take your privacy very seriously and we are committed to take every reasonable measure to keep your information secure. We monitor our systems 24/7 and continually work to improve the security of your personal information and our systems. We use encryption to ensure the security of your data during transmission. We always strive to process your personal data within the EU/EEA.

As Tymit is committed to always protect your personal data, we take all reasonable contractual, legal, technical, and organisational measures to ensure that your data is treated securely and with an adequate level of protection, compared to and in line with, at least, the level of protection offered within the EU/EEA.

We ensure that adequate safeguards are adopted in line with applicable data protection legislation, such as the GDPR, in case we transfer your data outside the EU/EEA. These safeguards consist of ensuring the third country or state at hand is subject to an adequacy decision by the European Commission, implementing the European Commission's standard contractual clauses or ensuring that the recipient is registered with the US Privacy Shield.

7. How long do we keep your personal information?

We will process your personal data for the time period needed to fulfil the respective purposes of our processing, as described in this Privacy Notice. This means that even though we stop processing your personal data for one purpose, we will keep your personal data if it needs to be processed for another purpose, using it only for that other purpose. In particular:

- For as long as you have accepted our Terms and Conditions, until you terminate those terms (by contacting us or by instructing us to delete data through for example by way of a right to erasure request), we will process the personal data we need to be able to deliver the Services to you, including but not limited to data relating to your purchase history.
- We process the personal data included in credit lookups for the purpose of new credit assessments for a time period of 90 days following the date that the lookup was done.
- We process debt-related personal data for the purpose of credit assessments for a time period of three (3) years following conclusion of the debt - by payment of the debt, the debt being written off by Tymit or sale of the debt by Tymit.
- We process the recordings of telephone conversations for a time period of 90 days for quality purposes but may keep the recordings for up to six years for regulatory requirements.
- We process personal data for the purpose of complying with applicable laws, such as anti-money laundering and bookkeeping. Depending on the applicable legislation, your personal data may be processed up to ten years after the end of the customer relationship.

8. Why do we process personal information?

We will only collect and use your personal information where it is necessary for us to carry out our lawful business activities. Our grounds for processing your data are as follows

Contractual necessity: We may process your information where it is necessary to enter into a contract with you or to perform our obligations under that contract. This may include processing to:

- Assessing your eligibility for the products and services we provide and providing and administrating the products we offer, including:
 - o *Setting up your account.*
 - o *Verifying your contact information.*
 - o *Collecting and issuing necessary information and documentation.*
 - o *Processing payments and disbursing money.*
 - o *Issuing statements, formal notices.*
 - o *Managing fees, charges and interest due on your account.*
 - o *Sending service communications and statutory notices.*
 - o *Collecting and recovering outstanding sums owed to us.*
 - o *Addressing any enquiries or complaints we receive from you or a representative you have appointed.*

Legal obligation: We may process your data where it is a legal or statutory obligation. This may include processing for:

- Confirming your identity.
- Detecting, investigating and reporting transactions in order to comply with laws relating to money laundering, financial crime and international sanctions, as well as taking measures to prevent it.
- Assessing affordability of any credit products for which you apply.
- Maintaining records of our business as required by law.
- Complying with laws which require us to provide information, directly or indirectly to any national authority, for the purpose of calculating and collection of tax.
- Responding to enquiries and requests for information by any of our Regulators.
- Creating and submitting reports required by any of our Regulators.

- Meeting our obligations under all laws and regulations based on law which apply to our business activities.
- Protecting vulnerable customers where we have a duty to do it.

Legitimate interest: We may process your information when we have a business or commercial reason to do so. If we do, it must never unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is. This may include processing for:

- Developing new products and services.
- Performing statistical analyses, analytics and profiling, for example, to create scorecards, models and variables in connection with the assessment of credit, fraud, risk or to verify identities, to monitor and predict market trends, and for analysis such as loss forecasting.
- Monitoring, reviewing and improving the content and appearance of our website, ensuring that content from our website is presented in the most effective manner, assessing how our customers use our website, products and services.
- Maintaining and developing our business systems, including without limitation its testing and upgrading.
- Assessing your eligibility for the Tymit Card.

9. These are your rights regarding your personal data

- **Right to be informed:** You have the right to be informed about how we process your information. We do this through this Privacy Policy, other information on our website, and by answering the questions sent to us.
- **Right to access your data:** You may request a copy of your data if you would like to know what personal information do we process about you. This copy of your personal data can also be supplied in a machine-readable format.
- **Right to rectification:** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure:** You have the right to request the deletion of your personal data, for example when it is no longer necessary for the purpose it was collected, or you have withdrawn your consent. As described in more detail in Sections 7 and 8, we are also subject to certain legal obligations preventing us from immediately deleting some of your personal data. These obligations derive from accounting and tax laws, banking and anti-money laundering laws, but also consumer rights laws.
- **Right to restrict processing of your data:** If you believe your information is incorrect or you believe we use your data unlawfully you have the right to ask us to stop the processing.

- **Right to lodge a complaint:** You have the right to lodge a complaint with the national supervisory data protection authority. Complaints to the UK supervisory authority (the Information Commissioner) can be made using this link: <https://ico.org.uk/>.
- **Controlling service settings:** For some specific features Tymit have provided you with a possibility to customize your preferences in the Tymit App, for example when it comes to whether you want to receive notifications or personalized marketing. We will always respect your individual choice.

10. How do we use automated decisions?

Occasionally we'll make decisions relating to you by using automated decision-making processes, including profiling, and without human involvement. The types of automated decision making include:

Eligibility and Credit Limit Decisions: When you apply for a Tymit Card we will use an automated process to decide whether you are eligible to be our customer, i.e. we may make our decision without any human involvement. This helps us to make fair and responsible decisions.

The process works by taking information you've provided when applying for the Tymit Card, any information we already have about you and information we obtain from third parties such as credit reference and fraud prevention agencies to calculate a credit score for you.

This information may include:

- How long you've lived at your address
- Your account history with us
- The number and type of credit agreements you have and how you've used them
- Whether you've been late making payments
- Whether you've had any court judgments made against you or whether you've been made bankrupt or had an IVA or other form of debt-related arrangement.

Using an automated credit scoring process means we may automatically decide that we are unable to offer you the Tymit Card, or only offer you a small credit limit, lower than that you might expect/request. Our credit scoring methods are regularly tested to ensure they remain fair, accurate and unbiased.

Fraud Detection: We use automated processes to detect and help eradicate fraud. We may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent activity, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. If we think there is a risk of fraud we may suspend your account and/or refuse you access to it.

Developing and marketing our products and services: We may use automated processing and profiling to help us develop products and services that would be of interest to existing and prospective customers, to manage your existing products and services to help you get the best out of them, and to provide you with marketing messages that we think you'll be interested in.

This automated decision-making and profiling may mean us making changes to your current products and services or the way we communicate with you.

Your rights in relation to automated decision making: See Section 9 above for further details about your rights in relation to data privacy and automated decision making.

If you feel the decision is incorrect, please write to us at support@tymit.com with the mobile number and e-mail address you used during application.

11. This is how we link to third party services

The Tymit App and Tymit Card Services may, from time to time, contain links to and from third-party websites, including those of other users, our partner networks, advertisers, partner merchants, news publications, retailers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

12. How to contact us, revoke your consent or make a complaint

If you have any questions, queries or concerns about this Privacy Policy or the treatment of your data, you can write us at privacy@tymit.com.

We hope that we can resolve any query or concern you raise about our use of your data but you may also lodge a complaint with the data protection authority. If you are still unsatisfied you can refer your concerns to the Information Commissioner's Office, the body that regulates the handling of personal information in the UK, at:

The Data Protection Officer (DPO)

Tymit

5 Merchant Square

London

W2 1AY

We hope that we can resolve any query or concern you raise about our use of your data but you may also lodge a complaint with the data protection authority. You can refer your concerns to the Information Commissioner's Office, the body that regulates the handling of personal information in the UK, at:

Information Commissioner's Office

Wycliffe House,

Water Lane,

Wimslow,

SK9 5AF

Tel: 0303 123 1113

Website: www.ico.org.uk

13. What cookies do we use?

We may use cookie technology on our website to collect some of the information detailed in this policy.

Cookies are small text files stored on your device or internet browser when you visit us. We use cookies mainly to improve the performance of the Tymit website and our service for customers.

Our Cookie Policy explains in more detail what types of cookie we use, why we use them and how to identify and disable them, but please be aware that some of our services will not function as smoothly if your browser disables all cookies.

As part of our commitment towards transparency and customer data privacy, we need to ask for your consent to set the marketing cookies described in our cookie policy. When you arrive on our website you will be asked for your consent to place these cookies on your device, stating that if you continue to use our website you consent to the placing of such cookies.

If you, or another user of your computer, wish to withdraw your consent at any time, you can do so by altering your browser settings or navigating to our Cookie Policy.

14. Changes and Updates to this Privacy Policy

We constantly work to improve our Service offerings in order for you to get an even smoother user experience. This includes both changes in existing Services and new Services over time. It's therefore important that you read this Privacy Notice each time you use a Tymit Service, since the processing of your personal data can differ since you last used one of our Services.