

# Tymit's privacy policy

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Tymit is committed to safeguarding the privacy of your information. By “your data”, “your personal data”, and “your information” we mean any personal data about you which you or third parties provide to us.

We may change this Policy from time to time so please check this page regularly to ensure that you’re happy with any changes.

## Who are we?

We are Tymit LTD (“we”, “our”, “us”) and operate under the name of Tymit. We’re committed to protecting and respecting your privacy. Tymit is the Data Controller for any personal data which you provide which is not related to the card. If you have any questions about your personal information email us a [privacy@tymit.com](mailto:privacy@tymit.com).

Please note that our partner, Transact Payments Limited (“TPL”), is the issuer of your payment card and is the Data Controller for the personal data which you provide to us in relation to the card only. TPL is authorised and regulated by the Gibraltar Financial Services Commission. TPL’s registered office address is 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA and registered company number is 108217. When you apply for a Tymit Card, you accept TPL’s Privacy Policy which is provided to you when you sign up for a card, is available within the Tymit mobile application and is also included in this document for your convenience.

## Information we hold about you

Information submitted through our website - for example, when you sign up and provide details such as your name and address, or details we collect about how you use the website Details of your transactions with us, including any cards and accounts used Information which is tied to your usage or settings on your phone - for example, the mobile network you use, your IP address or operating system Information from any social network or online account that you share with us.

## We use this information to:

Help manage your account Track, analyse and improve the services we provide you and other customers Search your record at credit reference and fraud prevention agencies to check your identity and generate a credit assessment of you. Credit reference agencies will keep a record of our enquiries, which may also be used by other organisations with access. This may affect your ability to get credit. Prevent illegal activities like money-laundering and fraud Market and communicate our products and services and those of affiliated partners where we think these will be of interest to you. You can always unsubscribe from receiving these if you want to by email Make responsible lending decisions.

## Who will we share it with?

We may disclose your personal information to: Anyone who works for us Any organisation which supports any of our products that you have Third parties that carry out advertising services for us Anyone who you give us explicit permission to share it with or If we must disclose your personal data to comply with the law, or to enforce our Terms and Conditions or other agreements; or to protect the rights, property, or safety of us, our customers, or others.

## 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 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>

## Rights

You have a right to access the personal data we hold about you, to delete your data, change and correct your data, or to obtain a copy of it. To do so please contact us by emailing [privacy@tymit.com](mailto:privacy@tymit.com). We may charge you a small fee to cover our costs for providing this information.

## What we will not do

We won't share identifiable personal data with third parties for their direct marketing unless you give us permission, we will only keep your personal information for only as long as we need to. We'll then delete it securely and safely. There may be times when you give us sensitive information such as your racial origin or trade union membership. We'll only use this information in strict accordance with the law.

## Where your data is stored

The data we collect from you may be transferred to and stored somewhere outside the European Economic Area ("EEA"). It may also be processed by staff outside the EEA who work for us or one of our suppliers.

## Complaints

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your personal information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner's Office (ICO). Details on how to raise a complaint with the ICO can be found here: <https://ico.org.uk/make-a-complaint/>

## Other websites

Our website may contain links to other websites. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

## Changes to this policy

Any material changes we make to our privacy notice in the future will be posted on this page and, if appropriate, sent to you by email.

## How to contact us

If you have any questions about our Privacy Policy or the personal information which we hold about you or, please send an email to our Data Protection Officer at [privacy@tymit.com](mailto:privacy@tymit.com).

# TPL Privacy Policy

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

TPL is committed to safeguarding the privacy of your information. By “your data”, “your personal data”, and “your information” we mean any personal data about you which you or third parties provide to us.

We may change this Policy from time to time so please check this page regularly to ensure that you’re happy with any changes.

## Who are we?

Transact Payments Limited (“TPL”, “we”, “our” or “us”) is the issuer of your card and is the Data Controller for the personal data which you provide to us in relation to the card only. TPL is an e-money institution, authorised and regulated by the Gibraltar Financial Services Commission. Our registered office address is 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA and our registered company number is 108217.

Tymit Limited (“Tymit”) is the Program Manager for your card program and is the Data Controller for any personal data which you provide which is not related to the card. Tymit is incorporated in England & Wales with registration number 10827757 and registered office at 5 Merchant square, London, England, W2 1DP.

## How do we collect your personal data?

We collect information from you when you apply online or via a mobile application for a payments card which is issued by us. We also collect information when you use your card to make transactions. We also obtain information from third parties (such as fraud prevention agencies) who may check your personal data against any information listed on an Electoral Register and/or other databases.

## On what legal basis do we process your personal data?

Contract

Your provision of your personal data and our processing of that data is necessary for each of us to carry out our obligations under the contract (known as the Cardholder Agreement or Cardholder Terms & Conditions or similar) which we enter into when you sign up for our payment services. At times, the processing may be necessary so that we can take certain steps, at your request, prior to entering into that contract, such as verifying your details or eligibility for the payment services. If you fail to provide the personal data which we request, we cannot enter into a contract to provide payment services to you or will take steps to terminate any contract which we have entered into with you.

#### Legal/Regulatory

We may also process your personal data to comply with our legal or regulatory obligations.

#### Legitimate Interests

We, or a third party, may have a legitimate interest to process your personal data, for example:

- To analyse and improve the security of our business;
- To anonymise personal data and subsequently use anonymized information.

## What type of personal data is collected from you?

When you apply for a card, we, or our partners on our behalf, collect the following information from you: full name, physical address, email address, mobile phone number, phone number, date of birth, login details, IP address, identity and address verification documents.

When you use your card to make transactions, we store that transactional and financial information. This includes the date, amount, currency, card number, card name, account balances and name of the merchant, creditor or supplier (for example a supermarket or retailer). We also collect information relating to the payments which are made to/from your account.

## How is your personal data used?

We use your personal data to:

- set up your account, including processing your application for a card, creating your account, verifying your identity and printing your card.
- maintain and administer your account, including processing your financial payments, processing the correspondence between us, monitoring your account for fraud and providing a secure internet environment for the transmission of our services.

- comply with our regulatory requirements, including anti-money laundering obligations.
- improve our services, including creating anonymous data from your personal data for analytical use, including for the purposes of training, testing and system development.

## Who do we share your information with?

We pass your information to our third party service providers, agents, subcontractors, program managers and other associated organisations for the purposes of completing tasks, managing your account and providing services to you on our behalf, as detailed above. When we use third party service providers, we have a contract in place that requires them to keep your information secure and confidential.

We pass your information to the following categories of entity:

- identity verification agencies to undertake required verification, regulatory and fraud prevention checks;
- information security services organisations, web application hosting providers, mail support providers, network backup service providers and software/platform developers;
- document destruction providers;
- mobile/digital payment services providers (where you choose to use such payment services)
- 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 TPL or any associated entity, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us.
- regulatory and law enforcement authorities, whether they are outside or inside of the EEA, where the law requires us to do so.

## Sending personal data overseas

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- with service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and Gibraltar data protection law.

These non-EEA countries do not have the same data protection laws as Gibraltar and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. We will send your data to countries where the European Commission has made an adequacy decision, meaning that it has ruled that the legislative

framework in the country provides an adequate level of data protection for your personal information. [You](#) can find out more about this [here](#).

Where we send your data to a country where the European Commission has not made an adequacy decision, our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses, please go to the [European Commission's website](#).

If you would like further information please contact our Data Protection Officer on the details below.

## How long do we store your personal data?

We will store your information for a period of six years after our business relationship ends in order that we can comply with our obligations under applicable legislation such as anti-money laundering and anti-fraud regulations. If any changes to applicable legislation require us to retain your data for a longer period of time, we shall retain it for that period. We will not retain your data for longer than is necessary.

## Your rights regarding your personal data?

You have certain rights regarding the personal data which we process:

- You may request a copy of some or all of it.
- You may ask us to rectify any data which we hold which you believe to be inaccurate.
- You may ask us to erase your personal data.
- You may ask us to restrict the processing of your personal data.
- You may object to the processing of your personal data.
- You may ask for the right to data portability.
- If you would like us to carry out any of the above, please email the Data Protection Officer at [DPO@transactpaymentsltd.com](mailto:DPO@transactpaymentsltd.com).

## How is your information protected?

We implement security policies and technical measures in order to secure your personal data and take steps to protect it from unauthorised access, use or disclosure.

While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have



given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## Complaints

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your personal information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Gibraltar is the Gibraltar Regulatory Authority. Their contact details are as follows:

Gibraltar Regulatory Authority,

2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar.

(+350) 20074636/(+350) 20072166 [info@gra.gi](mailto:info@gra.gi)

## Other websites

Our website may contain links to other websites. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

## Changes to our Privacy Policy

We keep our Privacy Policy under review and we regularly update it to keep up with business demands and privacy regulation. We will inform you about any such changes. This Privacy Policy was last updated on 10<sup>th</sup> November 2020.

## How to contact us

If you have any questions about our Privacy Policy or the personal information which we hold about you or, please send an email to our Data Protection Officer at [DPO@transactpaymentsltd.com](mailto:DPO@transactpaymentsltd.com).

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