

CardAlpha privacy policy

Welcome to our Privacy Policy

Last updated on March 29, 2020.

Thanks for using our website and services.

This webpage and any of our services are operated by CardAlpha Limited (“CardAlpha”, “we”, “us”, “our”) with its office at Level 39, Canada Square, Canary Wharf, London, United Kingdom E145 AB.

As CardAlpha, we understand personal data is important for you and we are committed to protecting the privacy of all our visitors and customers.

This privacy policy explains what personal data is, how we process your data, when is the data shared with third parties and what your legal rights are concerning personal data.

When you visit our website or use any of our services, you give us consent to process your information under this Privacy Policy. Therefore, we strongly encourage you to read it to help you make more informed decisions.

Please read each of the following sections and contact us if you have any questions.

The Privacy Policy aims to provide sufficient information regarding use of your personal data including the following topics:

1. What is Personal Data?
2. How is Personal Data processed?
3. Which processing activities does this Privacy Policy cover?
4. In relation to whom, is CardAlpha a data controller?
5. What information do we process about you and why?
6. How do we manage your personal data with third parties?
7. What are Cookies and other similar technologies?
8. How do we manage international data transfers?
9. How do we secure your data and how long is it stored?
10. What are your rights to your personal data?
11. How do we change this Privacy Policy?
12. How can you contact us?

1. What is Personal Data?

Personal data refers to any direct or indirect information about you that could be used to help identify you. Examples of Personal Data may include; names, addresses, phone numbers, but also computer log data, encrypted data and other types of electronic data (for example, IP address).

2. How is Personal Data processed?

Personal data is processed whenever any action is taken concerning your personal data in an automated way or not. Examples of processing activities include collection, registration, organisation, storing, deletion and transfer.

3. Which processing activities does this Privacy Policy cover?

This Privacy Policy covers our activities as a data controller. CardAlpha is a data controller in case we control the "why" and the "how" of a data processing activity. In other terms, CardAlpha is a data controller where we decide the "purposes" (why the data is collected) and "means" (which data is collected, how long it is stored) of the processing.

4. In relation to whom, is CardAlpha a data controller?

CardAlpha is the data controller for the following parties:

- Executives, directors, beneficial owners, authorised signatories of our Merchants
- Individuals contacting our customer support via telephone, e-mails or website based links
- End-customers of our Merchants requesting email receipts
- Applicants for employment with CardAlpha Consulting
- Existing employees and consultants of CardAlpha Ltd

Merchants:

We consider a retailer who uses our point of sale payment services, to be a "Merchant".

Directors, beneficial owners, authorised signatories of our Merchants:

CardAlpha is a data controller of personal information in relation to executive members, directors, beneficial owners or authorised signatories of Merchants. During the registration process for our services and products, CardAlpha may require information regarding the corporate structure of Merchants which may also include personal data related to their executives, **directors, beneficial owners or authorised signatories**.

End-customers of our Merchants requesting email receipts:

CardAlpha is a data controller of personal information such as Customer name, email address and location addresses when a Customer requests an email receipt from the Merchant via the CardAlpha platform.

Individuals contacting our customer support via telephoning, e-mailing or website:

CardAlpha is a data controller for personal data processed when someone telephones to our support team, uses our website or other channels. We are also a data controller of personal information for existing customers such as location data, personal preferences, IP-number, cookie identifiers.

Applicants for employment, existing employees and consultants of CardAlpha Ltd:

CardAlpha is a data controller for personal data for the applicants who have applied to the potential employment of our company or already started working as an employee. We are also a data controller for the consultants we collaborate with for the projects and processes.

5. What information do we process about you and why?

CardAlpha process the below information for the specified legal purposes.

	Data Categories collected by CardAlpha	Legal Reason of Data Collection
Beneficial owners, Directors, Authorised signatories of Merchants	<ul style="list-style-type: none">• Identification details (Names, Address, Date of Birth)• Contact information (Telephone number, Email Id, Address)• Information related to legal requirements (Shareholding etc)	<ul style="list-style-type: none">• To enable a legally binding contract between the Merchant and CardAlpha Ltd• For legitimate business requirements• For AML / KYC purposes
End - Customers	Email Identity	<ul style="list-style-type: none">• To enable CardAlpha's platform to dispatch a transaction receipt to an End-customer.
Individuals	Contact information Behavioral and tracking details	<ul style="list-style-type: none">• For legitimate business requirements including efficient customer service and marketing purposes (in case an individual contacts CardAlpha in connection with a business enquiry)
Applicants, employees, consultants	Contact information (Names, Addresses, Date of Birth, Email Ids, Phone numbers)	For legitimate business purposes including – 1) AML/KYC purposes

		<p>(potential and existing employees and consultants)</p> <p>2) For payroll processing purposes (existing employee and consultants)</p> <p>3) For contractual purposes, to enter into a legally binding contract with an employee or consultant</p>
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6. How do we manage your personal data with third parties?

Data collection from third parties:

CardAlpha may process personal data obtained from third parties such as:

- Credit bureaus
- Fraud detection agencies
- Other financial institutions
- Tax authorities
- Publicly available sources

This information may be required to be obtained and retained under law (for example for AML/KYC purposes) and also to supply to a Merchant, services requested by the Merchant including a card reader and the provision of a merchant acquiring contract with a licensed payment institution.

Data sharing with third parties:

We only share your data only for the purposes set out in this Privacy Policy. Below please see to whom we may share your Personal Data for what purposes.

Name of Third Party	Why We Share your Personal Data
Payworks	We may share information related to Beneficial owners, Directors and/or Authorised signatories of Merchants with

	Payworks, which is a payment gateway contracted by Bambora (the merchant acquirer and licensed payment institution) to process card transactions and to arrange delivery of terminals to merchants
Bambora	We share information related to Beneficial owners, Directors and/or Authorised signatories of Merchants with Bambora to enable Bambora in its capacity as a licensed payment institution to enter into a merchant acquiring contract with the Merchant and to carry out AML/KYC underwriting checks on the Merchant and their ownership / controlling structure.

Also time to time, we share your Personal Data with the following third parties:

- Suppliers and subcontractors who provide some kind of services such as IT, logistics, customer support, marketing, acquiring, etc.
- User experience, service design and market research agencies that help us in the improvement of the services and products we offer our customers.
- Analytics and search engine providers that help us in the improvement of the website and applications.
- Advertisers and advertising networks that require anonymised data to select and serve relevant adverts to you and others.
- Credit reference agencies to assess your credit score.

Please be informed that we will NOT;

- Use your personal data for any other purposes than those listed in this Privacy Policy, unless we collect your written consent or inform you before initiating any processing for new purposes or a purpose that is compatible with the purpose for which we collected the personal data, all under applicable laws and regulations.
- Share personal data with third parties for them to use for their marketing purposes without ensuring that there is a lawful ground to do so.
- Sell your personal data to third parties.

7. What are Cookies and other similar technologies?

CardAlpha uses various technologies to collect information when you access or use our services. Cookies are small data files that are stored on your hard drive or in your device memory when you visit a website or view a message. We begin collecting information about you or from your activity on devices you use as soon as you use our services. By using our services you permit us to collect and use your information from activity on devices you use under this Privacy Policy.

We use cookies to:

- Remember that you have visited us or used our services before. That allows us to identify a unique number of visitors we receive, so we can provide enough capacity to accomodate all users.
- Customise elements of the promotional layout or content of our services.
- Collect data to assess and improve our advertising campaigns.
- Allow business partners to use these tracking technologies to track your behavior on your behalf on our platform and partner websites.
- Enable third parties to collect data about the way you interact across sites.
- Collect statistical data about how you use the services and location where you access the services.

Below you can find the list of cookies and reasons for their collection through your activities.

Type of Cookies	Description and Further Information
Essential Cookies	They enable you to navigate and use all the features in the services. For example, without these, you are not able to navigate between pages on the website.
Functionality Cookies	They enable us to remember you have used our services before. Based on your preferences we may provide you a customised experience.
Performance and Analytical Cookies	This information is used to make sure our services can cope with the volume of users, to help us correct errors in the services and measure use across our services. It may also help us to identify the unique number of visitors and how long you spend on the pages.
Retargeting or Advertising Cookies	We may use third-party services such as Google Analytics to analyse statistical information from users of the site. These cookies collect information about the pages you visit and other information about the websites you visit.

8. How do we manage international data transfers?

If we transfer your personal data to a third country we will comply with all applicable laws in respect of such transfer, including making sure that your personal data is kept secure, and ensure that appropriate safeguards are in place to ensure there is adequate protection

9. How do we secure your data and how long is it stored?

Security of personal data for Merchants who have signed up for the CardAlpha electronic point of sale platform

Your personal data including passwords are stored on a private data cluster, hosted by a cloud computing provider. Access to this data is controlled via passwords and tokens.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website or our applications, you are responsible for keeping this password confidential and you must not share it with anyone. If you have reason to believe that your password has become compromised, you must inform us immediately using the email id admin@cardalpha.com.

The transmission of payment transactions between the Card reader and the merchant acquirer (Bambora) is carried out using Bambora's chosen payment gateway provider, Payworks and based on data protection standards agreed between Payworks and Bambora. CardAlpha does not process any card data between the card reader and the merchant acquirer's endpoint and is not responsible for the security of this data.

Please note the transmission of information via the internet is not completely secure and, although we will do our best to protect your information, we cannot guarantee the security of any of your information transmitted via the website or our applications. Consequently, any transmission is at your own risk. If we become aware that the security of your information has been compromised, we will notify you by email or as otherwise required by law.

10. Storage of your personal data

Personal Data will not be processed for a longer period than is necessary.

We will keep Personal Data for Merchants as long as they use our point of sale platform.

11. What are your rights to your personal data?

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- **to be informed** about certain details on the processing of your personal data. We provide this information through this Privacy Policy.
- **to access** the personal data that we hold about you. You may receive a copy of the personal data that we hold about you.
- **to correct** the personal data we process about you if you see that it is inaccurate.
- **to object** to our processing of your personal data.
- **to request** us to restrict the processing of your data.
- **to rectify** inaccurate or incomplete personal data that we hold about you.
- **to request** us to delete the data we hold about you.

You can directly contact us at admin@cardalpha.com for additional details.

12. How do we change this Privacy Policy?

By submitting your information to us, you consent to the use of that information as set out in this Privacy Policy. If we change our Privacy Policy, we will post the changes on this page and

may place notices elsewhere within the website (such as the home page) for a reasonable period, so that you may be aware of the changes.

In the event of any changes, we will also update the "Last updated" date at the top of this Privacy Policy. Your continued use of the website and/or our services following any changes to this Privacy Policy will mean you accept those changes.

13. How can you contact us?

Please contact us if you have any questions about Privacy Policy or the information we hold about you:

By email : admin@cardalpha.com