



## Privacy and You

### Who are we?

Prepaid Financial Services (PFS) is a fast-growing technology company and e-money payments institution with offices in the UK, Malta and Ireland. PFS is authorised and regulated by the Financial Conduct Authority in the UK, as an electronic money institution, under reference number 900036. We provide own label and white label e-money financial solutions, including e-wallets, prepaid cards, and current accounts. PFS provides complete end to end solutions for clients by designing, developing, implementing, and managing these programmes.

### What, Why?

It is important that you know exactly what we do with the personal information you and others make available to us, why we collect it and what it means for you. This document outlines the PFS approach to Data Privacy to fulfil our obligations under the EU General Data Protection Regulation (GDPR) 2018 of 25<sup>th</sup> May 2018. We also welcome it as an opportunity to reassure you of the importance we place on keeping your personal data secure, and of the strict guidelines we apply to its use.

### The personal data we would like to collect from you is:

- First Name and Surname with title
- Date of birth
- Email
- Proof of address documents
- ID Documents
- Other personal information such as telephone recordings; security questions, user ID
- CCTV footage where you visit our offices or branches
- Address
- Gender
- Bank Account details
- Telephone number
- Transactional information

### The personal data we collect will be used for the following purposes:

- ✓ Providing prepaid card services to you as per our contractual obligations
- ✓ Providing e-wallet services to you
- ✓ Providing IBAN Account services to you
- ✓ Processing your account information
- ✓ To comply with our legal obligations for the prevention of fraud, money laundering, counter terrorist financing or misuse of services
- ✓ Verifying your identity
- ✓ Contacting you regarding our service to you
- ✓ Where requested by law enforcement for investigation of crime

### Our legal basis for processing the personal data:

- ✓ receipt of your consent
- ✓ performance of a contract where you are a party;
- ✓ legal obligations that PFS is required to meet;
- ✓ national law

### Any legitimate interests pursued by us, or third parties we use, are as follows:

- ✓ the prevention of fraud, money laundering, counter terrorist financing or misuse of services

## **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified above. Consent is required for PFS to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

## **Consent for Children Under 16**

If you are giving consent on behalf of a child under 16 then please be aware that Children need specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned, and also of their rights in relation to the processing of personal data for the purposes of using these services. By consenting to this privacy notice on behalf of a minor you are giving permission for their data to be used for the purposes described above.

## **Withdrawal of Consent Conditions**

You may withdraw consent from direct marketing at any time by contacting our Data Protection Officer. Please note, where you have consented to your data being used for carrying out financial transactions, then the right to withdraw consent does not exist. As a payment service provider, PFS is obliged to retain data concerning financial transactions for 6 years in accordance with national law for the purpose of preventing, detecting and investigating, by the FIU or by other competent authorities, possible money laundering or terrorist financing.

## **Disclosure**

PFS will only pass on your personal data to third parties, including internationally, once we have obtained your consent. Some of our service providers, like payment processors, risk management solutions and suppliers are based outside of the EEA. Where we authorize the processing or transfer of your personal information outside of the EEA, we require your personal information to be protected to data protection standards and we ensure that there are adequate safeguards in place for data protection. The GDPR prohibits transfers of personal data outside the European Economic Area to a third country that does not have adequate data protection. Where transfer occurs outside the EEA the following mechanisms are in place with the third parties:

- ✓ Data Protection clauses in our contracts and agreements with third-parties
- ✓ EU-US Privacy Shield
- ✓ Personal Information Protection and Electronic Documents Act (PIPEDA)

## **Retention period**

PFS will process personal data for the duration of the contract for services and will store the personal data for 6 years after that date of termination of the contract.

## **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- > Right of access – you have the right to request a copy of the information that we hold about you.
- > Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- > Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Your data relating to financial transactions, accounts or cards

cannot be deleted due to national law associated with the prevention of fraud, money laundering, counter terrorist financing or misuse of services for crime.

- > Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- > Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- > Right to object – you have the right to object to certain types of processing such as direct marketing.
- > Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- > Right to judicial review, in the event that PFS refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data. You will find a copy of our Subject Access Request Form on our website.

### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by PFS (or third parties as above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and PFS's Data Protection Officer by email to [DPO@prepaidfinancialservices.com](mailto:DPO@prepaidfinancialservices.com)

Data Protection Officer  
Prepaid Financial Services  
Fifth Floor,  
Langham House,  
302-308 Regent Street, London,  
W1B 3AT

If you are unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO).

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
ICO helpline  
Telephone: 0303 123 1113

Further information can be found in our Cookies Policy on our website.