



PayPoint Notification Service - Privacy Notice

Application

This Privacy Notice applies to personal data provided by you in relation to the PayPoint Notification Service.

It applies to individuals who provide us with personal data to request information published by us in relation to our products, services, events, corporate announcements, press announcements and other initiatives.

This notice describes how we as a "Data Controller", collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018 together with any amendments and/or additional thereto.

It applies to all processing of personal data of individuals using our PayPoint Notification Service.

The kind of information we hold about you

We may collect, store, and use the following categories of personal information about you:

- personal details such as name, title, addresses, telephone numbers and email addresses;

We ask that you do not disclose any such information to us if you are uncomfortable for it to be stored on our systems to comply with our regulatory obligations or use to provide you with the PayPoint Notification Service.

How is your personal information collected?

We collect the personal data you provide to us when you complete the registration form or updated you details or preferences.

How we will use information about you

We will only use your personal information when the law allows us to; this is known as a "legal basis" for processing.

Situations in which we will use your personal information

We may use your personal information to:

- Notify you information published by us in relation to our products, services, events, corporate announcements, press announcements and other initiatives. We will only do so where you indicated to us that you wish to receive such information; and



- meet our other compliance and regulatory duties, for example to retain certain records.

Where you have provided the same information to us for a different purpose, that will be covered by the privacy terms applicable to that purpose or service.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, where this is required for regulatory and/or compliance purpose and to the extent this is required or permitted by law or regulation.

Data sharing and third party processors

We may need to share your personal data with third parties, including other entities within the PayPoint group and our auditors. We may also share your personal data with the registrars and printers appointed by each of them from time to time. Where we share your personal data with another party performing services for us (not for you), we require those third parties to respect the security of your personal data and to treat it in accordance with the law.

Disclosures

We may share your personal information with:

- a regulator (such as FCA and/or HMRC) and/or investigatory authorities in order to comply with the law;
- the administrator of the service;
- a screening or identity checking service to the extent required by law;

A list of our current third party service providers is provided at the end of this notice.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group only in so far as necessary to provide notifications you have requested or contracted from us.

Data Security

We have put in place measures to protect the security of your information. Details of these measures are included in group-wide policies which cover the following:

- management and organisation of information security;
- classification of data which includes data handling rules;
- staff training on responsibilities connected to information security and data protection, and the reporting of any information security incidents;



- physical and environmental security; and
- systems security, including backups, virus protection and access controls.

Our policies and controls are based on the international standard for information security, ISO27001. We are committed to implementing, maintaining and continually improving an information security management system in accordance with that standard.

Our approach supports the enhancement of information security controls and our information governance framework. The framework includes a cross functional senior management group supported by expert advice to oversee an effective information security strategy. We also have an oversight programme designed to maintain the confidentiality, integrity and availability of your data when it is processed by other organisations on our behalf.

Data Retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or regulatory requirements.

You will appreciate that due to the nature of the notifications, there are record retention obligations on us. As a result, where necessary, we will retain your personal data in order to comply with these obligations.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

You can exercise these rights by contacting privacy@paypoint.com



What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

Right to Withdraw Consent

Where you may have provided your consent to the collection, processing or transfer of your personal information in order to receive material from us, you have the right to withdraw that consent at any time.

To do so, please contact us using the details above, or where it relates to email notification only, using the unsubscribe link provided in all PayPoint notification emails.

Once we have received notification that you have withdrawn your consent, we will no longer send you the relevant notifications. If you have notified us that you no longer wish to receive any materials from PayPoint, we will delete your details after 6 months.

Data Protection Officer

If you have any questions about this privacy notice, please contact privacy@paypoint.com. If you are unhappy with how we handle your personal information, please contact the Data Protection Officer at privacy@paypoint.com. If we do not resolve your concerns to your satisfaction, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this Privacy Notice

We may update this privacy notice from time to time, and will communicate such updates through our website. We will not do so where we believe this would materially impact your rights and freedoms: in those circumstances we will expressly notify you.

We may also notify you in other ways from time to time about the processing of your personal information.

Third party providers who may process your personal data on behalf of PayPoint consist of:

- Finer Vision
- Microsoft Inc
- Salesforce Inc
- Service Now

The service provider will be determined by the notification method and type selected by you.



Transfer of data

We select our service providers on the basis of their expertise and commitment to protection of data. Our service providers are primarily based within the EEA but may for operational and technical purposes from time to time process data outside the EEA. Any such transfer will be subject to compliance with applicable laws. Unfortunately, we are unable to provide the service to you unless you agree to such transfer.

Cookies

The following cookies are used on this website.

- **_utma**: This Google Analytics cookie is used to determine the number of unique visitors to our website and it is updated with each page viewed. This cookie persists for 2 years unless deleted by the user.
- **_utmb**: This Google Analytics cookie is used to establish and continue a user session with this site, this cookie is updated to expire in 30 minutes, thus continuing a single session for as long as user activity continues within 30-minute intervals.
- **_utmc**: This Google Analytics cookie is a tracking code to determine session status. Persists for the duration of the browser session unless deleted
- **_utmz**: This Google Analytics cookie stores the type of referral used by the visitor to reach your site. Persists for six months unless deleted.
- **_utmv**: Google Analytics Cookie. Used for user-custom variables in Analytics
- **Hotjar**: Used to track user behaviour on website.

For more information on how to manage cookies please see our main website www.paypoint.com and <https://www.paypoint.com/privacy-cookies>

Please note that the above list is subject to change.

Revised: 11 December 2018.