



## Privacy & Policy

Last update: 10.04.2023

### I. Why should you read this Privacy Policy?

KAF International Payment Business LTD or IPBPAY is committed to the personal data protection principles outlined in European and UK law and recognizes the significance of protecting its customers' information. We are continually enhancing our data processing activities and privacy notices to provide you with as much clarity as possible regarding how we manage your data. This Privacy Statement explains how we collect, use, and store your personal information, as well as your rights if you wish to modify how we use your personal information.

If you have concerns about how we use your personal information, you can contact our data protection officer at [legal@ipbpay.com](mailto:legal@ipbpay.com)

If you are uncertain of the meaning of any term used in this Privacy Policy (such as "IPB PAY Account" or "IPB PAY Card"), you may consult the other legal documents governing the IPBPAY Digital Wallet services, of which this Privacy Policy is an integral part.

#### 1.1 About us.

When this policy mentions "we," "us," or "our," it refers to KAF International Payment Business LTD, Company Number 14815623, seat and registered address at: BIRCHIN COURT, 20 BIRCHIN LANE, BANK, LONDON UNITED KINGDOM EC3V 9DU, which is responsible for your personal information under this Privacy Policy.

#### 1.2 Personal information of third parties:

If you have provided us with information about a third party, such as your representatives/power-of-attorney holders, employees, children, or spouse, we will treat this information with the assumption that you have informed these third parties of this Privacy Statement and obtained their permission to share their information with us. Examples of such situations include:

- Whenever you order an additional card embossed with the names of a friend;
- Whenever you pay any kind of tax, fee, e-vignette or similar on behalf of another person, including a co-owner or similar;
- Other similar cases.

### II. How do we process your personal information?

#### 2.1 What information do we process about you?

We request and collect the following personal information from you when you use the Digital Wallet:

Type of personal data	Purpose of processing	Legal grounds	What third-party processors can we use this?
<b>Names</b>	Due diligence	Compliance with legal obligations; defense of our legal claims	Our auditors; legal or other similar counsels; debt collection agencies; compliance outsourcing providers; regulators
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of yourpayee; top-up providers; auditors; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	For card production (embossing of the name on the card)	Our contract with you	None
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consentform
	Facilitating our social features	Our legitimate interests in developing the Platform and drive user interaction	Other users of the Service* This usually happens only in context of social media activities, i.e. in cases where you have tagged us in a post or during promotional events whose specificity demands such data processing. You can always ask us to remove your personal information in this context and we will act upon your request ASAP.
<b>Date and place of birth</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of yourpayee; top-up providers; auditors; legal or other similar counsels; regulators
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consentform
	Purchase of a bus ticket through our integrated bus ticket service	Our contract with you; Compliance with legal obligations;	Our auditors; legal or other similar counsels; transport service provider
<b>Registered address</b>	Due diligence	Compliance with legal obligations; defense of our legal claims	Our auditors; legal or other similar counsels; debt collection; compliance outsourcing providers; regulators
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of yourpayee; top-up providers; auditors; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
<b>Nationality</b>	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators

<b>Official ID Document and all data contained in it</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators.
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of yourpayee; top-up providers; auditors; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Recordings of your video or selfie verification (in case its applicable to you)</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Information about your tax status</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Provide you with the possibility to checkand pay your taxes	Our contract with you	Government or municipal tax databases; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Source of income</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Marketing	Legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Turnover</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Marketing	Legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Proof of address or other verification data, which wemay request depending on your particular situation</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators;
<b>Phone number</b>	Customer authentication	Compliance with legal obligations	Communication service providers; legal or othersimilar counsels; support outsourcing providers
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Legal or other similar counsels; support outsourcing providers
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Performance our contract	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consentform.
	Facilitating login to our platform	Our contract with you	None
	Communicating important messages regarding the Service	Compliance with legal obligations.	Communication service providers; compliance andrisk outsourcing providers; legal or other similar counsels; regulators;
	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar

<b>Email</b>	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Legal or other similar counsels; support outsourcing providers
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form
	Facilitating login to our platform	Our contract with you	None
	Communicating important messages regarding the Service	Compliance with legal obligations	Communication service providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators;
	Providing you with the option to receive tax-deduction statements when you use our KAF IPB Causes functionality	Our contract with you	Communication service providers: charities and other non-profits which we have included in KAF IPB Causes
	Risk and compliance analysis and action	Compliance with legal obligations.	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
	Purchase of a bus ticket through our integrated bus ticket service	Our contract with you; Compliance with legal obligations;	Our auditors; legal or other similar counsels; transport service provider
<b>Device ID and log data (including IP address)</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; regulators.
	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	Support outsourcing providers; software outsourcing providers; legal or other similar counsels; regulators
	Facilitating use of our platform	Our contract with you	None
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Payment Transaction, use of our e- money service</b>	Initiate a payment, send or request money, acceptance of card payment, funding transaction of your KAF IP account	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers; legal counsels; our auditors; regulators
	Create an account connection between your Account and a third-party account or platform, if applicable	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers; legal counsels; our auditors; regulators
	Administering our loyalty programs (if applicable to you)	Our contract with you	Other participants in your transactions and their financial institutions; payment scheme operators (if applicable); support outsourcing providers; legal counsels; our auditors
	Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking the services or by applying other fraud prevention measures	Legal obligations	Software outsourcing providers; compliance outsourcing providers; PEN test and other similar auditors; PCI DSS auditors; legal counsels; other similar consultants
	Enforce our legal claims arising from any chargebacks, negative balance, or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
<b>Specific client identifiers, and, where applicable, other data such as registered address for a particular service and other similar</b>	Initiate a payment, send or request money, acceptance of card payments, top-up, payments toward specific merchants or entities	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers; legal counsels; our auditors; top-up providers; specific merchants or entities; regulators

<b>Orders, use and other data related to cards issued by us</b>	Providing you with the option to order and use our payment cards as described in the legal agreement for the Service	Our contract with you	Compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; other participants in your transaction's financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; regulators
	Marketing	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
	Automated card data update. In order to not inconvenience any product or service you have ordered previously, in case of recurring transactions initiated by you and if the supplier is part of the specific Card scheme program for updates, the supplier receives the updated card details.	Our contract with you	Card scheme (VISA & Mastercard); Merchants towards which you have made a recurring transaction.
	Providing support	Our contract with you	Support outsourcing providers
<b>Login credentials</b>	Customer authentication	Compliance with legal obligations	None
	Facilitating use of our platform	Our contract with you	None
	Providing support	Our contract with you	Support outsourcing providers
<b>Delivery address</b>	Delivering cards and other packages, offered through the Service	Our contract with you	Courier companies; support outsourcing providers; legal consultants; regulators
<b>Geolocation</b>	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers; regulators
	Providing you location-based services	Your consent	Support outsourcing providers
	Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking the services or by applying other fraud prevention measures	Legal obligations	Software outsourcing providers; compliance outsourcing providers; PEN test and other similar auditors; PCI DSS auditors; legal counsels; other similar consultants
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Profile photo</b>	Facilitating our social features	Your consent	Other users of the Service
<b>Stored loyalty cards</b>	Maintaining our legal relationships by continuously providing you an option to add and store your loyalty cards	Our contract with you	None
	Marketing	Our legitimate interests	None
	Providing support	Our contract with you	Support outsourcing providers
	Providing support	Our contract with you	Support outsourcing providers
<b>App preferences</b>	Facilitating use of our platform	Our contract with you	None
	Providing support	Our contract with you	Support outsourcing providers
<b>Contact list</b>	Providing you with an easy way to interact with other users of the platform	Your consent	None
<b>Chats with other KAF IPB users</b>	Facilitating use of our platform	Our contract with you	None – our chat service uses end-to-end encryption and even KAF IPB personnel cannot access your chats
<b>Interactions with our App</b>	Facilitating use of our platform	Our contract with you	None
	Personalize, Measure, and Improve our Advertising and Marketing	Our legitimate interests	Marketing services providers
	Operate, protect, improve, and optimize the KAF IPB services and your experience, such as by performing analytics and conducting research	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers

<b>Interactions with our support team</b>	Providing support	Our contract with you	Support outsourcing providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Interactions with our Socialmedia channels (further information will be provided in our social media-specific privacy policies)</b>	Personalize, Measure, and Improve our Advertising and Marketing	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers

## 2.2 Specific data sharing

**In any case, we may share any of your information for specific reasons, outlined below:**

- a. **With other members of the KAF IPB corporate family, for the purposes of consolidation.** We may share your Personal Data with members of the KAF IPB company.
- b. **Aggregated Data.** We may also share aggregated information (information about our users that we combine so that no individual user can be identified or referenced) and other anonymized information for regulatory compliance, industry and market analysis, demographic or other profiling, marketing and advertising, and other legitimate business purposes. Since the information is anonymized, this does not comprise the processing of personal data.
- c. **With our legal counsels, auditors and similar for the purposes of protecting our legal rights.** We may share any information required to safeguard our legal rights with legal counsel or other parties in a similar position.
- d. **Business Transfers.** If any of the service-providing companies are involved in a merger, acquisition, reorganization, sale of assets, transfer of portfolio, bankruptcy, or insolvency event, we may sell, transfer, or share some or all of our assets, including your information, in connection with or in contemplation of such a transaction (e.g., due diligence). Before your personal information is transferred to a different legal entity and/or becomes subject to a different privacy policy, we will notify you.

### 2.3 Decisions based solely on automated processing.

Our systems may occasionally make decisions based solely on automated processing. This does not imply that we will always rely on automated decision-making for these processing tasks. If you believe you have been treated unfairly by our automated decision-making systems, you may always request a human review of the decision by contacting us as described in the "How to file complaints" section. Such choices may be made for processing activities such as:

Processing activity	Automated processing logic
Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking the services or by applying other fraud prevention measures.	Our fraud-prevention and monitoring systems may sometimes take automated decisions in regards to suspicious behavior. For example, we may block a certain transaction which was made in a remote part of the world just a few minutes after your last login from your home country.

### 2.4 Information collected about you from third parties.

When you sign up for our services, we may ask certain entities for information about you.

Typically, these entities are fraud prevention agencies, Know Your Customer and Anti-Money Laundering Checkup service providers that assist us in meeting our legal obligations for customer due diligence.

We may also gather information about you from public sources for AML and market research purposes. This comprises:

- official public records, like your national Company registry information
- published by the press or on social media.

If you use one of our partners' services, such as the insurance services, they may share information about your transaction with us.

### 2.5 Retention periods.

a. We retain your personal information for as long as our contractual relationship is in effect.

We will retain your data for no longer than 5 years after the year of our last interaction, unless a shorter/longer retention period is mandated by applicable national law.

We may retain some of this information in exceptional circumstances, such as when necessary to defend our legal rights or if there is an active and ongoing investigation involving you.

If you are only using the Starter profile version of our app (without access to the payment services), we will retain your data for no longer than six months after the date on which you last accessed your profile.

b. Because we protect our records against accidental or malicious loss and destruction, residual copies of your personal information may remain in our backup systems for a limited time.

## III. Your rights

You may exercise any of the rights outlined in this section before the Data Controller in accordance with the General Terms and Conditions for KAF IPB by sending an email to KAF IPB from your registered email address for the services. Please be advised that we may ask you to verify your identity before proceeding with your request. Please note that upon receiving your e-mail, we will do our utmost to provide you with the requested information and respond to your inquiry within a reasonable timeframe, subject to any legal obligations that we or our affiliated companies may have.

### 3.1 Managing your information.

You have the right to obtain the following:

- confirmation of whether, and where, we are processing your personal data.
- information about the purposes of the processing.
- information about the categories of data being processed.
- information about the categories of recipients with whom the data may be shared.
- information about the period for which the data will be stored (or the criteria used to determine that period).

- information about the existence of the rights to erasure, to rectification, to restriction of processing and to object to processing.
- information about the existence of the right to complain to any Regulator.
- where the data was not collected from you, information as to the source of the data; and
- information about the existence of, and an explanation of the logic involved in, any automated processing.
- Additionally, you may request a copy of the personal data being processed.

### **3.2 Rectification of Inaccurate or Incomplete Information.**

You have the right to ask us to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself via your online access to KAF IPB Account).

### **3.3 Data Access and Portability.**

You have the right to:

- receive a copy of your personal data in a structured, commonly used, machine-readable format that supports re-use; transfer your
- personal data from one controller to another.
- store your personal data for further personal use on a private device; and
- have your personal data transmitted directly between controllers without hindrance.

In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us.

- Because we maintain the KAF IPB to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

### **3.4 Withdrawing Consent and Restriction of Processing.**

You may revoke your consent to our processing of your personal information at any time by modifying your Account settings or by sending us a communication specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the legality of any processing activities that were predicated on such consent prior to its withdrawal. Additionally, in some jurisdictions, applicable law may grant you the right to limit how we use your personal information, in particular if (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; or (iii) we no longer need your personal information to fulfill the purposes of the processing, but you require the information for the establishment, exercise, or defense of legal claims.

### **3.5 Objection to Processing.**

In some jurisdictions, applicable law may entitle you to require us not to process your personal information for certain specific purposes where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defense of legal claims. In case you do not wish us to process your personal data for certain specific purposes, which are legitimate purposes to us, we may have to stop providing you some or all of the services.

You may at any time request that we stop using your personal information for direct marketing purposes by sending an e-mail to the addresses listed below.

Whenever we use your personal information for marketing purposes, we will also provide an opt-out option.

### **3.6 How do I complain?**

a. You should initially attempt to rectify the issue by sending an e-mail to the Data Controller from the e-mail address you used to register for the Service:

Data Protection Officer (DPO): [it@kaf-ipb.com](mailto:it@kaf-ipb.com)

BIRCHIN COURT, 20 BIRCHIN LANE, BANK, LONDON UNITED KINGDOM EC3V 9DU



#### **IV. Operating globally.**

In order to facilitate our global operations, we may be required to transfer, store, and process your information within our organization or with service providers situated in Europe, India, Asia-Pacific, and South America. There may be legal differences between these countries and your country of residence. For instance, information collected within the EEA may be conveyed, stored, and processed outside the EEA for the purposes outlined in this Privacy Statement. When transferring, storing, or processing your personal information outside the EEA, we have taken the necessary precautions to ensure an adequate level of data protection.

#### **V. International transfers**

##### **5.1 Adequacy Decisions.**

Whenever we disclose any of your collected personal information to a third party, we will comply with any applicable adequacy decision.

##### **5.2 Other means to ensure an adequate level of data protection.**

In the event that personal information is shared with corporate affiliates or third-party service providers located outside the EEA in the absence of an adequacy decision, we have established the necessary means to ensure an adequate level of data protection and a valid legal ground under the applicable data transfer rules. Upon request, we will provide additional information on the means to assure an adequate level of data protection.

#### **VI. Security**

We are responsible for ensuring the security of your personal information, which is stored in an encrypted format on servers located in Class A data centers in Europe. To prevent unauthorized access or disclosure of nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with applicable regulations. Once you are logged into your Account, all internet communications are encrypted using Secure Socket Layer (SSL) technology with High-grade security Encryption (AES-256, 256-bit keys, and access to your personally identifiable information is restricted to employees who need to know that information in order to provide products or services to you.

If you know or have reason to believe that your KAF IPB Account credentials have been lost, stolen, misappropriated, or otherwise compromised, or in the event of actual or suspected unauthorized use of your KAF IPB Account, please contact us using the information provided in the Contact Us section below. While we are committed to securing our systems and Services, you are responsible for protecting and maintaining the confidentiality of your password(s) and Account/profile registration information, as well as for ensuring that the Personal Data we maintain about you is accurate and up to date.

#### **VII. Can children use our services?**

The services are not intended for those under 18 years old. We do not knowingly collect information, including Personal Data, from minors or those who are not legally permitted to use our services. If we obtain actual knowledge that we have collected Personal Data from a person under the age of 18, we will delete that information without delay, unless we are required by law to retain it. If you believe that we have mistakenly or unintentionally collected information from a person under the age of 18, please contact us.

#### **VIII. Changes to this privacy policy**

This Privacy Statement may be modified at any time in accordance with this provision. If we make modifications to this Privacy Policy, the revised Privacy Policy will be posted on the KAF IPB Platform. You may cancel your Account if you do not concur with the revised Privacy Policy. If you do not terminate your Account before the revised Privacy Policy goes into effect, your continued access to or use of the KAF IPB Platform will be subject to the revised Privacy Policy.

#### **IX. Contact us**

If you have any queries or concerns about this Privacy Statement or our information handling practices, please send an email from your registered email address for the Services to the addresses listed in **Section 3.6**.

*Please keep in mind that for the objectives of the issued card, each Card scheme is a separate data controller. You can learn more about the Card scheme's data processing policies by visiting their website.*

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