

## Visa Concierge Mobile App Privacy Notice Highlights

**UPDATED AS OF:** 3<sup>rd</sup> July 2018

Visa operates the Visa Concierge Platform on behalf of your Bank or other Financial Institution that issued your Visa card. The Bank or other Financial Institution is the Data Controller in respect of Personal Information processed as part of the Visa Concierge Platform, and their contact details can be found on your Visa card statement or on the back of your Visa card. Visa is a Data Processor acting on behalf of the Data Controller.

We highly value and respect the privacy of the personal information we obtain from you in connection with your use of Visa Concierge, including your name, address, account numbers and other information that can be used to individually identify you (collectively, "**Personal Information**".) This notice sets out the highlights as to how we collect, use and share your Personal Information. For full detail, please see our [Visa Global Privacy Notice](#), including the supplemental Notice for individuals in the [European Economic Area](#) ("**EEA** ").

### Information We Collect

Visa may collect information in a number of ways in connection with Visa Concierge, including, without limitation, as follows:

- When you enroll in Visa Concierge, set up a Visa Concierge account ("**Account** ") and make changes from time to time, we will collect the Personal Information you voluntarily choose to provide, such as your name and mailing, shipping and email addresses, phone numbers, birthdates, driver's license numbers, and passport numbers. We may also collect your security questions and answers, username, password and other demographic information and preferences.
- We collect credit, debit, prepaid or other payment card or other financial account information you provide to us in connection with Visa Concierge ("**Card Details** ").
- We collect rewards program numbers, frequent flyer numbers, and other loyalty program numbers you provide to us in connection with Visa Concierge ("**Loyalty Numbers**").
- When you make a purchase through Visa Concierge or you otherwise provide purchase information to Visa Concierge, we may collect certain purchase and shipping tracking information.
- When you ask us to send goods or services to a third party ("**friend**"), we collect we collect certain personal information about your friend for the purpose of providing the fulfilling your request. If you are going to provide Personal Information of any friend to us as part of the Service, you will ensure that the third party is aware of our Notice. Where we require consent from you in respect of certain use of any personal data, including your or any other third party's personal data, you will obtain and will have obtained the corresponding consent from such third party before you provide the Personal Information to us.
- When you ask us a question, we collect email address or other contact information you choose to provide.
- We collect information you voluntarily submit when participating in one of our various services, programs or surveys.

Other Personal Information that we collect include:

- Age Range
- information about the Services you require and that will allow us to provide the requested Service
- Mobile number
- Biometric data
- Location information
- Passwords

We may collect information about your use of the Visa Concierge Platform such as:

- How you use the Platform, including your use of its features and functionality.
- IP address and information about the device you use to access the Platform.

We may collect or compile non-Personal Information about Platform users such as enrollment numbers or demographic group information on an aggregated and anonymized basis.

#### **Core Ways We Use Personal Information**

- To enable the functionality you use through the Visa Concierge Platform
- To contact you with details or updates about your requests
- To process your requested transactions and bookings.
- To send you Visa Concierge promotional emails and offers through your mobile device, where you have consented to this.
- To email or message you with important information and updates about Visa Concierge and your Visa Concierge Account, including confirmation of transactions and bookings.
- To generally provide the features and functionality of Visa Concierge to you.
- To conduct surveys.
- To respond to questions and comments.
- To improve, enhance and tailor Visa Concierge for you, and to improve and enhance the overall Visa Concierge experience for all Visa Concierge users.

## HOW WE SHARE PERSONAL INFORMATION

Visa may disclose to third parties all categories of Personal Information (and location information if you choose to use a location-based function of the Platform, as applicable) that it collects as follows:

- At Your Request: We disclose your Personal Information to a third party whenever you request us to do so.
- We may share your personal information with the financial institution (or other entity) that issued your Visa card (or other payment mechanism) and with merchants, other financial institutions and third parties as needed to process transactions, for risk and fraud management, to provide services to such entities, and for similar purposes (such as investigating and resolving disputed charges) and to comply with applicable law.
- We may share your personal information with our affiliates, which may only use your personal information for the purposes listed herein.
- We may share your personal information with our service providers, who are bound by law or contract to protect your personal information and only use your personal information in accordance with our instructions.
- We also disclose personal information where permitted by law, such as when needed to affect the sale or transfer of business assets, to enforce our rights, including our Terms of Use or Service, to protect our property, or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal information when required to do so by law, such as in response to a witness summons, including disclosure to law enforcement agencies and courts in the United States and other countries where we operate.

In addition, In order to provide the Concierge services, we will be sharing your information with our Concierge service provider Concierge Holding Company Limited (“John Paul”), the SUB-PROCESSOR, John Paul will capture, store and manage your data as a third party (SUB-PROCESSOR) supplier of Visa.

Further, John Paul may share your data with other 3<sup>rd</sup> party providers to enable or allow the provision of requested services to you. This includes and is not limited to merchants providing dining, travel, shopping and other services.

Legal Entity	Purpose of data sharing	Data shared
John Paul	Provision of service	All data provided by cardholder or captured as part of the service delivery

### Your Choices

To modify your profile information or your options, please go to the My Profile or Settings section on the left hand side burger menu of your Visa Concierge app. Alternately you can contact your Concierge via email or letter with your requests.

In addition, you have choices about how Visa uses your Personal Information. You always have the right to object to our marketing communications. You can also object to having your

Personal Information used to create anonymised and aggregated marketing reports. Please [click here](#) to exercise these choices and other choices.

Visa also respects the rights of EEA citizens to access, correct and request the deletion or restriction of their Personal Information as required by law. Where Visa is processing your Personal Information as a data processor, we will refer you to our client (such as to your Visa card issuer) for assistance with these requests. Visa supports its clients in responding to requests as required by law.

If you believe that we have processed your Personal Information in violation of applicable law, you may also file a complaint with the Visa Data Protection Officer, who can be reached by contacting the Visa Global Privacy Office, or with a supervisory authority.

### **LOCATION-BASED SERVICES**

The Platform may offer certain location-based services to you. You understand that these location-based features require the location details of your mobile device to function properly and your use signifies your agreement to use your location for purposes of the service. If you do not want the Platform to use location-based information, please refrain from using a location based service or click "DON'T ALLOW" when your mobile device requests your location-based information. Except as set forth in this Privacy Notice, your location will not be shared with third parties without your specific consent.

### **Questions?**

Full details as to how we collect, use and share your Personal Information can be found in the [Visa Global Privacy Notice](#), including the supplemental Notice for individuals in the [European Economic Area](#)

If you have any questions or concerns about this Notice or the privacy practices of Visa Concierge, please contact us at [privacy@visaconcierge.eu](mailto:privacy@visaconcierge.eu) or write to us at:

Address: Visa Europe Limited, 1 Sheldon Square, London, W2 6TT  
Attention: Data Protection Officer

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