

Wirecard Im Card Privacy Policy

Last Updated: 26 October 2018

Overview—the key information

This privacy policy describes how Wirecard Card Solutions Limited (“Wirecard”) collects, stores and uses your personal information and how you can exercise your privacy rights. This privacy policy applies to personal information that we process in relation to the Im Card Website at <https://lmcards.lastminute.com/>, the Im Card App and your Im Card.

In this policy, we use the terms “we”, “us”, and “our” (and other similar terms) to refer to Wirecard and our group companies including Wirecard UK and Ireland Limited.

This policy is an important document. We recommend that you read it carefully and print and keep a copy for your future reference.

How to contact us

The data controller of your personal information is Wirecard Card Solutions Limited (company number: 07875693) of Grainger Chambers, 3-5 Hood Street, Newcastle Upon Tyne, United Kingdom NE1 6JQ.

If you have any questions about how we collect, store and use your personal information or if you would like a copy of the information we hold about you, then please contact us. You can either:

- write to us at: The Data Protection Officer, Wirecard Card Solutions Limited, Grainger Chambers, 3-5 Hood Street, Newcastle upon Tyne, NE1 6JQ; or
- e-mail us at: WDCSDataPrivacy@wirecard.com.

What does Wirecard do?

Wirecard provides card issuing and other related services. Wirecard works with Lastminute.com to enable you to be issued with your Im Card and so that you may carry out card payments using your Im Card.

The personal information that we collect from you

(a) Information that you provide when registering for an lm Card

- **Registration information:** to register for an lm Card, you are first required to share the following types of personal information with us (or our Wirecard group company, Wirecard UK and Ireland Limited) so that we can set up your lm Card and verify your identity:
 - name;
 - residential address;
 - contact details (mobile phone number and email address);
 - date of birth;
 - IP address of sign-up location;
 - bank account details; and
 - any other supporting documents which may be required, including a form of photo identification such as your passport.
- **Use of the lm Card:** we will also collect information relating to your use, and our administration of, the lm Card so that we are able to provide the lm Card services to you. This includes using your mobile phone number and email address to provide balance updates and transaction alerts (in the manner requested by you) to facilitate settlement and reconciliation of your lm Card account, to carry out due diligence and anti-money laundering checks and ongoing transaction monitoring for compliance with our regulatory obligations and to comply with the VISA scheme requirements and to deal with any enquiries you may have in relation to your lm Card.

(b) Information that we collect when you visit the lm Card Website

We or third parties acting on our behalf, may collect and use the following information created and recorded automatically when you visit the lm Card Website:

- **Technical information:** this includes your Internet Protocol (IP) address used to connect your computer to the Im Card Website, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information.
- **Information about your visit and your behaviour on the Im Card Website:** we also collect information about how your device has interacted with the Im Card Website, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to the Im Card Website, where they come from, and what content is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of the Im Card Website to our visitors. Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

Cookies and similar tracking technology

The Im Card Website uses cookies and similar tracking technology (collectively, “Cookies”), which are small files placed on your internet browser when you visit the Im Card Website. We use Cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.

Where we use Cookies on the Im Card Website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some Cookies. However, if you use your browser settings to block all Cookies (including essential Cookies), you may not be able to access all or parts of the Im Card Website or to use all the functionality provided through the Im Card Website.

For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookies Policy [here](#).

(c) Further data processing

Furthermore, Wirecard also processes your personal data:

- **For communication purposes:** we will use your personal information to communicate with you about any events we are organising or participating in, and/or to inform you about other services that may be of interest to you. We will only contact you in accordance with the contact preferences that you have specified (which may include email) and will not send you marketing communications where you have told us you do not wish to receive these. You can specify your contact preferences when registering online to receive services from us (for example, when registering for the Im Card) or by subsequently advising us of your contact preferences using the contact details provided above.
- **To collect our charges or costs in connection with other legal enforcement:** We will use your personal information to agree payment arrangements with you, and to collect our fees and costs owing to us in connection with legal enforcement.
- **For monitoring and quality assurance purposes:** We may monitor telephone and e-mail communications between you and us for the purpose of quality assurance and training or as otherwise permitted by law.

Your data protection rights

You have the following data protection rights, subject to certain exemptions and satisfying certain conditions:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading above.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading above.
- Similarly, if we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading above.

- If you have any queries or complaints about our collection, use or storage of your personal information, please contact us using the contact details provided under the "How to contact us" heading above. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information. You also have the **right to complain to** the data protection regulator in the country in which you live and work (in the UK, this is the Information Commissioner's Office), about our collection and use of your personal information.
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Who we share your personal information with

We disclose your personal information to the following companies or categories of recipient

- **Lastminute.com:** so that they may provide you with their services related to your lm Card and providing loyalty services such as vouchers for specific spends on the Lm card.
- **Other Wirecard group companies:** to provide you with our services. Specifically, your lm Card is supported and managed (including administration and fraud checks) by Wirecard UK and Ireland Limited in Ireland, Wirecard Processing FZ-LLC (WDP) provides transaction processing and issuing platform support and Wirecard Communication Services GmbH provides IVR and customer care and call centre services.
- **Card manufacturers:** to be able to provide you with a physical card.
- **Shipping companies:** to send you your lm Card.

- **Fraud prevention entities and other organisations:** to check all personal information given by you and to verify your identity in accordance with our regulatory obligations.
- **Service providers and other third parties:** to enable us to provide our services to you.
- **To any competent law enforcement body, regulatory, government agency, court or other third party:** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.
- **To an actual or potential buyer (and its agents and advisers):** in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.
- **To any other person with your consent** to the disclosure.

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

We will collect personal information from you (i) where processing is necessary to fulfil a contract with you (that is, to provide you with your Im Card and to deal with any issues occurring in relation to your Im Card); (ii) where the processing is in our legitimate interests and not overridden by your rights (for example, to verify your identity, for fraud prevention and for risk assessment purposes); or (iii) we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you (for example, to comply with statutory or regulatory obligations or court or governmental obligations).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading above.

International transfers of personal information

Wirecard may need to transfer your personal information to business partners, service providers and other Wirecard offices that are located in territories outside of the European Economic Area ("EEA").

Specifically, our website servers are located in Germany. However, we may support the Im Card and associated services from centres such as the USA, Dubai and India and we may process payments through other organisations such as banks, payment processors, card networks and payment schemes which are located outside the EEA. Personal information transferred out of the EEA is safeguarded under the terms of the European Commission's Standard Contractual Clauses.

How we look after your personal information

We have in place appropriate technical and organisational security measures to protect your personal information against unauthorised or unlawful use, and against accidental loss, damage or destruction. We put in place strict confidentiality agreements (including appropriate data protection obligations) with our third party service providers. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Data retention

We retain personal information where we have an ongoing legitimate business need (and legal basis) to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.