

# Privacy Policy for Denizen

Last updated: 05/02/2019

## 1. General

Wirecard Bank AG ("Wirecard", "we") together with Denizen Global Financial SAU ("Denizen") respects users' right to privacy. This Privacy Policy describes how Wirecard collects, stores, shares and uses personal data about you, and how you can exercise your privacy rights. This Privacy Policy only applies to personal data that we process in relation to Denizen (the "Product"). This Privacy Policy does not describe how Denizen processes personal data; if you wish to know more about this, please refer to their privacy policy. We operate the Product in accordance with the provisions of the European General Data Protection Regulation 2016/679 ("GDPR"), any applicable implementing legislation, and all other provisions with relevance in the area of data protection law.

## 2. How to contact us

The data controllers of your personal data are Wirecard Bank AG, Einsteinring 35, D-85609 Aschheim and Denizen Global Financial SAU, Plaza de Santa Barbara 1, 28004 Madrid, Spain as separate controllers.

If you have any questions about how Wirecard collects, stores and uses your personal information or would like a copy of the information it holds about you, then please contact us. You can either write to us at the above address or e-mail us at: [service@wirecardbank.com](mailto:service@wirecardbank.com)

If you have any questions about how Denizen collects, stores and uses your personal information or would like a copy of the information it holds about you, please visit Denizen's privacy statement for further information.

## 3. What is Denizen about

Wirecard offers its customers products and services relating to electronic payment transactions. The objective is to allow companies and consumers worldwide to process electronic transactions safely and smoothly. Security and the protection of personal data is one of the most important aspects in the context of handling and processing of payments. This is

why Wirecard places particular emphasis on high data protection standards. For more information about Wirecard, please see our website at [www.wirecard.com](http://www.wirecard.com).

Denizen allows customers to make payments using physical payment cards or other transaction means.

## **4. Collection and Processing of personal data for contract fulfilment**

### **4.1 Information we receive from Denizen**

When you register for Denizen, Wirecard receives the following information from Denizen:

- Full name;
- Date of birth;
- Residential address;
- E-mail address and mobile phone number;
- Encrypted account data, in particular password and security question with security answer;
- Details of transactions you carry out;
- Information about how you use and manage your Denizen account

### **4.2 Purposes of processing**

All of this data is received and processed to set up your account and to verify your identity as required by law. Also, we process the above listed personal data to provide you with the Denizen product, i.e. carry out your transactions and to facilitate payment.

### **4.3 Transfer of personal data**

Wirecard shares your personal data with other Wirecard companies, our service providers and third parties as follows

- Other Wirecard Companies to provide you with our services. Specifically, but without limitation, our services use and rely on the back-office processing and storage services of our German affiliate company Wirecard Technologies GmbH and its systems and servers based in Germany. Access to personal data stored on these

servers may also be granted to other Wirecard Companies for the provision of our services, e.g. to Wirecard Communication Services GmbH for customer support services.

- MasterCard as a card network and payment scheme, to provide the Denizen product;
- 3rd party e-wallet providers, as Apple Pay, Google Pay, Fitbit or Garmin wallets: If the user adds the card to a 3rd party e-wallet, card details and name are at user's option transferred manually or automatically to the 3rd party provider. When adding the card to the 3rd party e-wallet, the user has to accept the 3rd party providers T&Cs which describe how user data is shared and processed.
- Law enforcement agencies, regulatory organisations, courts or other public authorities: to comply with law or regulation or in connection with proposed or actual legal proceedings or regulatory actions;
- Selected third parties, who may use your personal information to send you marketing messages, if you have agreed that they may do so;
- We transfer reports containing anonymized information (and no personal data) to Denizen.

#### **4.4 Information you provide when you contact us**

We will store the personal data provided by you when you contact us (e.g. name, address, telephone number, e-mail address) in our customer relationship management system. We will use such personal data

- to respond to your contact request;
- in anonymized form to support our internal business objectives (namely data analyses, revisions, the development of new products, improvement of this internet presence, improvement of our services, detection of usage trends and determination of the effectiveness of our advertising campaigns);
- in order to prevent and identify abuse or fraud.

The data collected via the contact form will not be forwarded to third parties.

#### **4.5 Marketing communications**

If a user has decided to receive marketing communications from us, we use the provided email address and mobile phone number to send email marketing messages and push notifications. Users may opt out

from email messages within the Denizen settings or by using the opt-out link in the email footer area. Push notification opt-out can be performed in the iOS system settings, or in Android app settings.

#### **4.6 Legal basis for processing personal data**

Our legal basis for processing the personal data described above is the performance of the contract we have with you for the payment card issued to you within Denizen. Besides, it is in our legitimate interest to process your personal data to carry out credit checks, check your identity, for fraud prevention and risk assessment purposes. We also need the personal data to deal with any issues that might incur, and to comply with any statutory obligation or court or governmental order.

### **5. How we look after your personal information**

Wirecard has appropriate technical and organisational security measures in place 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 data protection obligations) with our third party service providers.

### **6. International data transfers (including to outsourced service providers)**

Wirecard will transfer, or permits specific access to, your personal information to business partners, service providers and other Wirecard offices that are located in territories outside of the European Economic Area ("EEA"). We may process payments through other organisations such as banks, payment processors, card networks and payment schemes that are located outside of the EEA. However, if we process your personal data outside the EEA, we have in

place appropriate measures such as Binding Corporate Rules, Standard Contractual Clauses or EU-US Privacy Shield certifications providing for an adequate level of protection.

## 7. Data retention

When Wirecard does not have any legal basis to process your personal data, it will be deleted.

Wirecard retains personal data collected from you where we have an ongoing legitimate business need to do so to provide you with a service you have requested or to comply with statutory retention obligations  
e.g. under tax or accounting law.

## 8. Your data protection rights

If you wish to **access, correct, update** or **request deletion** of your personal data, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading above.

You can object to processing of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data. 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 process your personal data 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 data conducted in reliance on lawful processing grounds other than consent.

You have the **right to complain to a data protection authority** about our collection and use of your personal data. For more information, please contact us at the above e-mail address.

Please be aware that your exercise of these rights will not automatically trigger the same request at Denizen. Hence if you want to receive information about Denizen’s collection and use of your personal data, and exercise your rights, please contact Denizen at the address provided by Denizen in their privacy policy.

Our data protection officer can be reached under [data.privacy@wirecard.com](mailto:data.privacy@wirecard.com)