

IMPORTANT INFORMATION AND WHO WE ARE.

This privacy policy aims to give you information as to how we collect and process your personal data. It is important you read this privacy policy and any updates thereto so you are fully aware as to how and why we are using your data. This privacy policy supplements other notices given to you.

i-movo is the data controller and we are responsible for your personal data. References to “company”, “we”, “us” and/or “our” refers to the relevant i-movo Limited (“Company”) or the relevant company in the PayPoint Group.

THE DATA WE COLLECT ABOUT YOU.

We may, depending on the service you use, require:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of services you have provided to us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our services and websites.
- **Profile Data** includes your username and password when login on or using the Company’s information services and websites.
- **Usage Data** includes information about how you use our website and the Company’s information services.

HOW IS YOUR PERSONAL DATA COLLECTED?

From time to time we collect personal data directly from you or when you use services such as our cash out voucher service or other digital voucher services.

As part of our regulatory obligations we may also obtain personal data from third parties for the purpose of identity verification and completing other regulatory and compliance checks.

Where we act as a processor for an organisation providing services to you, you should look to your service provider for details of the processing of your personal data.

HOW WE USE YOUR PERSONAL DATA.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

We will use your personal data in relation to your use of our services. The lawful basis for processing is the terms of your appointment as a director and our legal and regulatory compliance obligations.

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

MARKETING

Generally, we do not rely on consent as a legal basis for processing your personal data. To the extent any processing is based on consent such as where you have agreed to marketing, you have the right to withdraw consent to marketing at any time by contacting us via our contact details set out below.

DISCLOSURES OF YOUR PERSONAL DATA.

We may share your personal data with other members of the PayPoint Group, government, regulatory and investigatory bodies and How we will use your personal data above.

We may disclose your personal data to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

Our primary systems and external third parties are based inside the EEA. To the extent any of our systems and/or the use of an external service provider includes processing of your personal data outside the EEA the following will apply.

- Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.
- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the USA, we may transfer data to them if they are part of the Privacy Shield or such other adequacy provisions as approved by the Information Commissioner which requires them to provide similar protection to personal data shared between Europe and the US.
- We may transfer your personal data to Jersey to support our back up and contingency operations.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

By law we need to keep basic information about our service users (including contact, identity, financial and payments) for a minimum of seven years for legal and regulatory purposes.

In some limited circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our Data Protection Officer in the following ways:

Full name of legal entity: i-movo Limited

Email address: privacy@paypoint.com

Postal address: 1 The Boulevard, Shire Park, Welwyn Garden City, Hertfordshire, AL7 1EL.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review and provide updates via the address above.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

GLOSSARY

References to:

- Data Subject
- Personal Data
- Processing

- Controller

shall have the same meaning as assigned to them in the Data Protection Act 2018 and the applied General Data Protection Regulations.

PayPoint Group means any of the following companies and or any company in common holding.

PayPoint Plc.

PayPoint Network Limited.

PayPoint Collections Limited.

PayPoint Retail Solutions Limited.

PayPoint Payment Services Limited.

PayPoint Trustees Limited

i-movo Limited

i-movo Holdings Limited

Handepay Ltd

Merchant Rentals Limited

RSM 2000 Limited

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Version control

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