

Privacy Notice

What data do we collect?

Crunch Payments Limited has a company registration number ais 11929149 and our registered office address is; 104 Wapping High Street, Wapping, London, E1W 2PR.

As part of our Card Program Operation we are required to collect information of a personal nature from you by our Controller which is the Issuing Bank of your Card. This information is used to operate the facilities we offer to you through your card and to comply with laws and regulations. Recently there has been the introduction of new regulations The General Data Protection Regulation, this is a new, European-wide law that replaces the Data Protection Act 1998 in the UK and the Data Protection Act 2004 (Amendment) Regulations 2018 in Gibraltar, both known as GDPR. These provide individuals with new rights in relation to how your personal data is collected, used and stored and provides new rules for organisations on how to handle personal data.

Personal data consists of things such as name, address, date of birth, telephone number, email address, IP address and your location, token number of your card, these are some things that Crunch need to collect to operate the services for your card. Crunch **will never collect or hold** sensitive data from you. This data includes things like sexual orientation, political view or health information.

We will only collect from you the personal data we require to operate your card service as instructed by our Issuers and will always limit the purpose we use it for. We will not collect any personal data from you that we do not need in order provide the services we have agreed to provide you with or to fulfil legal requirements places upon us.

How Does GDPR Affect You?

GDPR aims to give power back to you and let you have more control over your data. GDPR gives you some **new rights** and builds on some old rights in relation to your data, such as:

Right to erasure - also known as the 'right to be forgotten'. The GDPR introduces a right for individuals to have personal data erased. The devil is in the details though, as this right is not absolute and only applies in certain circumstances.

Right to data portability - The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. In plain terms this allows you to

instruct a company to take all your data and send it elsewhere, for example if you were to switch phone networks without changing your number.

Right to be informed - Individuals have the right to be informed about the collection and use of their personal data.

You also have the right to lodge a complaint with the relevant data protection authority. For further information on lodging a complaint please contact us via support@crunchpayments.com

How does GDPR Affect Us?

If it looks like that breach will adversely affect individuals' rights and freedoms (for example a person could be in danger of identity theft), you have a right to be informed as soon as possible.

Other things Crunch will be doing:

We will be monitoring compliance with the GDPR and other data protection laws;
be raising awareness of data protection issues, training staff and conducting internal audits; and
Co-operating with supervisory authorities such as our Issuer, our Regulator, the ICO and any other appropriate body to ensure we are abiding by their requirements.

What do we do with your data?

The personal data we collect from you will be processed by us, on the instruction of our Issuer, who will in turn be using it, furthermore some third parties who need the information to ensure a smooth operation and secure and lawful process will also be processing it. These are as follows:

- Our staff in the UK and Spain;
- Our data processing partner, Global Processing Services Limited, ("**GPS**"). GPS' company registration number is 131101V and its registered office address is; 2nd Floor, St. Mary's Court, 20 Hill Street, Douglas, IM1 1EU, Isle of Man. GPS stores and processes data in the Isle of Man. The Isle of Man is the recipient of an adequacy decision of the European Commission; this means that the European Union is satisfied that data stored and processed in the Isle of Man is protected adequately;
- Our fulfilment partner, Thames Card Technology Limited, ("**Thames**"), Thames' company registration number is 2952822 and its registered office address is; Thames House, Arterial Road, Rayleigh, Essex, SS6 7UQ, United Kingdom;

Our issuing partners, Transact Payments Limited, ("**TPL**"), TPL's company registration number is 108217 and its registered office address is; Unit 4A, Leisure Island Business Centre, 23 Ocean Village Promenade, Gibraltar or Paysafe Financial Services Limited, Company Registration number BR019793. London Office, 25 Canada Square, London, E14 5LQ.

- Our e – KYC partners:
- IDV Global Limited, (“**IDV**”), IDV’s company registration number is C 62006 and its registered office address is; E301 The Hub, Triq Sant Andrija, San Gwann, Malta;
- W2 Global Data Solutions Limited, (“**W2**”), W2’s company registration number is 7669978 and its registered office address is; Clarence House, Clarence Place, Newport, Gwent, NP19 7AA, United Kingdom;

No other third parties will have access to your data unless you have given your consent, or there is a legal obligation for us to provide such access. Please be aware that your information may be stored on a cloud – based system whose servers are located within the European Union.

We take all reasonable steps to ensure that your personal data is processed securely and more information on this can be found on our website; www.crunchpaymentst.com

How long do we keep this data?

We will generally keep your personal data for a minimum period of 5 years from the date on which our relationship with you ends, after which it will be disposed of securely if it is no longer required for the lawful purpose(s) for which it was obtained.

Here is a link to our updated Data Protection Policy and those Policies of our Issuers, we would ask you to read them through to understand all the rights you have under the new Regulations.