

LION Payment UK Ltd.

Privacy Policy

LION Payment UK Ltd. (“LION Pay”, “we”, “us” and “our”) is committed to protecting your privacy. This notice should be read in conjunction with the Business Terms and Conditions of use at <https://lion-pay.com/uk> (the “Website”) which it forms part. LION Payment UK Ltd. is registered as a Data Controller under the terms of the Data Protection Act 1998 and we ensure we comply with all the protection the Act affords to you.

Introduction

In this Privacy Policy, Personal Information and Personal Data refer to any information relating to an identified or identifiable individual. LION Pay is committed to ensuring that it collects, uses, shares, processes and secures Personal Information in accordance with this notice. This includes customer, prospective customer or former customer of LION Pay (including individuals who maintain a card with one of our financial institution clients) and any principals, including the managing and financial directors, any other directors and officers, shareholders, partners and beneficial owners of a customer as well as any member of staff accessing or using the LION Pay on behalf of a customer.

The word ‘card’ in this notice applies to all payment methods and types, not simply those involving a physical card; and use of the term ‘cardholder’ applies to any shopper or individual whose payment transactions may be processed.

By accessing and using LION Pay Services, including LION Pay’s interactions with you via our websites, mobile sites and applications (“Sites and Services”), you agree to the processing of Personal Information as set out in this Privacy Notice.

What kind of Personal Information Does LION Pay Collect?

LION Pay collects Personal Information relating to cardholders, merchants or other customers, suppliers and other business partners in order to carry out its business activities. LION Pay may collect various kinds of Personal Information including:

- Information you voluntarily provide, for example when you apply, enquire to us, take part

in our marketing schemes and promotions;

- Information collected by cookies and other tracking technologies when you use our Sites and Services , including our role as a payment processor; and
- Information collected from third parties, including credit reference agency, fraud monitoring providers, commercial databases, or know your customer (KYC) providers.

More specifically, Personal Information may include:

- Contact information: name (first, last and business), telephone numbers, address (home, billing and business), fax, email address and other communications;
- Demographic information: nationality, citizenship, country of residence, date of birth, marital status, birth place, gender, preferred language;
- National Identification information: national insurance number, passport, social security number, taxpayer identification number, driver license or other form of identification
- Employment information: employment status, industry, annual income and approximate savings.
- Records of Monitoring: records of telephone calls, emails, web chats, access control or other communications;
- Merchant or other Customer identification, such as: merchant or customer ID;
- Merchant or other Customer management, including billing, invoicing, refunds, reconciliations and reporting;
- Records of points or rewards in a loyalty scheme;
- Information on purchased items, including: where, when, how much and any other remarks on the purchase;
- Payment transaction information: monitoring transaction, fraud, products/services and trend;
- Credit card information: account number, card expiration date, CVC details, bank and/or issuer details;
- Credit risk information: credit history, credit score and fraud monitoring information obtained about you from credit reference or fraud prevention agencies;
- HR information: information provided in a job application, or your registration to email alerts of future vacancies;
- Technical information: the Internet protocol (IP) address, your device ID, login information (username/password), browser type and version, time zone setting, browser plug-in types and versions, device operating system platform, mobile carrier, location or GPS/geo-location;

- Information about your website usage: the full Uniform Resource Locators (URL) clickstream to, through and from LION Pay's site (including date and time), products or services you viewed or searched, page response times, download errors, length of visits, page interaction information (scrolling, clicks and mouse-overs), methods used to browse away from the site page, whether you opened an email, any phone number used to call LION Pay;
- Photographs and videos of you taken during LION Pay events, identity verification or in an interview;
- Publicly accessible comments and opinions posted on social networking sites, such as Facebook and LinkedIn;
- Insights gained from you through LION Pay events (anonymized basis); Applications, downloaded and service you are using.

For What Purposes Does LION Pay Use Personal Information

LION Pay uses Personal Information for purposes that are appropriate, based on legitimate interests or as authorized by applicable law. These purposes may include:

Legal, regulatory or law enforcement purposes:

- In the course of litigation;
- In case of National security;
- Requirement or permission by law or regulations, tax purposes or to comply with financial services regulations;
- To comply with local and national laws, including card scheme rules and requests from law enforcement and regulatory authorities;
- To enforce our legal rights and obligations, such as reporting or disclosure obligations under applicable law, subpoena, court order, other judicial or administrative process, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights, property or safety of others;
- To prevent, detect and prosecute fraud or crime or to assist others in doing so;
- To carry out obligations arising from any contracts between you and us;
- To make important notices on changes to our website and our goods and services;
- To recover debt including tracing your whereabouts;
- To maintain internal recordkeeping and reporting;
- To prepare and furnish compilations and analyses as well as other reports of aggregated and anonymized information;

- To check your personal or business credit status/profile and identity; and
- To record and track details of your transactions or your customer's transactions.

HR purposes:

- To process your job application;
- To register and send you email alerts of future vacancies; and
- To maintain internal recordkeeping and reporting.

Credit risk purposes:

- To identify and monitor for fraud;
- To assess financial and insurance risks; and
- To mitigate information security, sector or credit risk.

Security Purposes:

- To conduct our own due diligence checks;
- To administer LION Pay's Site and Services for internal operations, including troubleshooting;
- To keep LION Pay's Sites and Services safe and secure;
- Mitigate information security, sector or credit risk.
- For example, if you report your card lost/stolen, we may give the Police any information we think will be useful in the investigation.

Marketing Purposes:

- For Marketing and market research including customer acquisition, usage analysis, lead generation and cross-sell/upsell;
- To manage LION Pay survey, promotion, contests and events;
- To provide information about products and services you requested, purchased or which may be of interest to you to;
- To make our website, events and product and services more innovative and effective;
- When LION Pay communicates with you or each other;
- To create profiles and marketing opportunities;
- For social media site integration and interaction;

- To announce to you about important changes or developments to LION Pay's Sites and Services or goods and services;
- To allow you to participate in interactive features of LION Pay's service; and
- To enable you to participate in discussion boards or other social media functions on LION Pay's Sites and Services.

Product and Product Development Purposes:

- For products, meaning data analytics, business finance, self-service, fraud service, foreign exchange service, currency services, as well as the development of new products.
- Prepare and furnish compilations and analyses as well as other reports of aggregated and anonymized information;
- Commercial purposes, such as trend analysis and the use of data analytics to obtain learnings and insight around cardholder transaction patterns and usage; and
- Better understand card usage patterns or to optimize your experience.

Customer Services/Account Management Purposes:

- To enable you to contact us;
- Operations, which includes: IT, telephony, security and analytics services;
- Transaction Processing, which includes: compliance monitoring, scheme operations, disputes/chargebacks, capturing payments, settlement, gateway services, pre-paid card processing and program management and authorization;
- To provide training;
- To authorize and establish commercial merchant accounts;
- Enable you to upload and/or store information;
- To facilitate collection or redemption of points or rewards currency of any Loyalty program;
- Manage, investigate and resolve complaints;
- To enable you to enter a competition, promotion or survey;
- To enable you to report a problem with LION Pay's site;
- Analyze and advise you or your customers' use of any Loyalty service;
- Manage disputes of transactions, rewards or points;
- For subscription to a LION Pay service;
- Understand LION Pay's customers' requirements;

- Notify you about important changes or developments to our website or our goods and services

Business purposes:

- Improve and develop LION Pay's business;
- Business partners (including those in which LION Pay has an investment), suppliers and sub-contractors for the performance of any contract LION Pay may enter into with them or you;
- Transfer information and/or assets in the event of a merger, acquisition, sale, bankruptcy filing, or other corporate restructuring;
- If LION Pay or substantially all of its assets are acquired by a third party, in which case Personal Information held by it about its customers will be one of the transferred assets; and
- If LION Pay sells or buys any business or assets, in which case LION Pay may disclose your Personal Information to the prospective seller or buyer of such business or assets.

Suppliers purposes:

- Fulfilling or processing orders or application forms i.e. for job vacancies;
- Processing payments;
- Managing credit, security, sector and fraud risk;
- Market research; and
- Survey activities.

With Whom Does LION Pay Share Personal Information

LION Pay may share Personal Information with our group companies like parent company and its subsidiaries. We may also share Personal Information with LION Pay-approved third parties for lawful purposes, such as legal and regulatory purposes.

LION Pay ensures there are adequate safeguards in place to protect the processing of that data if and when Personal Information must be shared. Except where permitted, LION Pay does not sell, rent, share or otherwise disclose Personal Information to third parties for the third party's commercial purposes.

LION Pay does not disclose information that could identify you personally to anyone, except as described in this notice, including, but not limited to:

- Any Hirose group company (where LION Pay belong);
- Any group company (such as advisers, share plan, payroll and other third-party administrators, agents or contractors working on behalf of LION Pay);
- Financial institution clients;
- Service providers and other third parties under contract who help with our business operations (including, but not limited to, auditor, fraud investigations, site analytics and operations);
- Regulatory authorities, such as the UK's Financial Conduct Authority ("FCA") and Data Protection Authorities;
- Social media sites integrated into web services that we offer; and
- Third parties who may have introduced you to our services such as affiliates;
- Governmental or quasi-governmental organizations.

Where LION Pay uses and/or discloses confidential or cardholder transactional data for preparing and furnishing compilations, analyses and other reports of aggregated information and anonymized information, it will do so provided it has taken all reasonable measures to avoid identifying any customer of LION Pay other than the customer whose transactions were involved in the preparation of any compilation, analysis or other report.

Use of LION Pay Websites

LION Pay respects the privacy of children. We do not knowingly collect or retain Personal Information from children under the age of 18. For more information on this, please visit the Information Commissioner's Office's website at <https://ico.org.uk/for-organisations/guide-to-data-protection/key-data-protection-themes/children/>.

Cookies are widely used on the internet to recognise a user's device, without uniquely identifying the individual person using the computer. This technology helps easier login and use of the website, it also provides feedback about your viewing preferences from a previous use of the website. LION Pay's website use cookies to store small amounts of information on your device to allow assessment of the effectiveness of the website or communication, to provide a better user experience or to serve LION Pay advertisements to you while browsing other websites. LION Pay may also use the aggregate information from these technologies

to research and understand how the Sites and Services are used.

Some web browsers may send out 'do not track' signals. Currently, there are no industry standards on what websites and other online services should do upon receipt of such signals. When such a standard is ready, LION Pay will re-evaluate its notice, but currently takes no action on receipt of 'do not track' signals.

Certain features in LION Pay may only be available through the use of tracking technologies. Temporary cookies are used to enable you to navigate our site and use its features. Temporary cookies are deleted when you close the browser. IP addresses are used in conjunction with cookies for the purpose of "remembering" computers or other devices used to access our site.

Analytical or performance cookies are used to collect anonymous information such as the count of visitors to our websites, what search terms used, what pages are viewed, and the last page visited. This information is based on the visitor's IP address, and this cannot identify a specific person.

Under this notice, information collected by cookies and similar technologies are considered Non-Personal Information. To the extent that Internet Protocol (IP) addresses (or similar identifiers) are clearly defined to be Personal Information under any local law and where such local law is applicable to LION Pay Services, LION Pay will treat such identifiers as Personal Information.

For more information about cookies, see www.allaboutcookies.org and [LION Pay's Cookies Policy](#). It is possible to configure your browser not to accept cookies, however, please note this may affect your ability to use the website.

About Other Websites

LION Pay is not responsible for the privacy policies and practices of other websites even if these links were suggested in our Website. We recommend that you check the policy of those websites you visit and contact the owner or operator of such website if you have any concerns or questions.

Sharing your information outside of the EEA

All information you provide to us is stored on our secure servers. Any payment transactions

will be encrypted using SSL technology. For any debit/card payments, we do not hold your card details.

We operate globally and so it may be necessary to transfer your personal information to other companies within our group of companies or to other third parties located in countries outside of the EEA (specifically, Japan, Hong Kong, Malaysia, and Singapore). It may also be processed by staff operating outside the EEA who work for us, one of our suppliers, Introducers, business partners, agents or sub-contractors. They are engaged in; (i) the fulfilment of your order; (ii) the processing of your payment details; (iii) the provision of administration and support services in respect of your customer account with us; (iv) communicating with you about your account and your account functionality and tools; (v) marketing and/or promoting services to you; and (vii) marketing.

By using our LION Pay Sites and Services, you agree to this transfer, storing and processing.

Individual's Privacy Rights (Data Subject Rights)

Under the EU's General Data Protection Regulation, individuals located in Europe are able to exercise rights regarding their Personal Information. For more information on these rights, please visit the Information Commissioner's Office's website [here](#).

These rights include:

- Access
If you ask us, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). £10 as an administration fee may be charged if you require additional copy.
- Rectification
You are entitled to have the personal information rectified if what we hold about you is inaccurate or incomplete. If we have shared your personal information with others, we will inform them about the rectification where possible. Upon request and where possible and lawful to do so, we will also let you know who we have shared your personal information with so that you can contact them directly.
- Erasure
You can ask us to delete or remove your personal information in certain circumstances such as where we no longer need it or you withdraw your consent (where applicable) provided that we have no legal obligation to retain that data. This is subject to retention

requirements in accordance with applicable laws and regulations and subject to section SAFEGAURDING AND RETENTION OF RECORDS. If we have shared your personal information with others, we will let them know about the erasure where possible. Upon request and where possible and lawful to do so, we will also let you know who we have shared your personal information with so that you can contact them directly.

- Processing Restrictions

You have the right to request the restriction or suppression of your personal data.

This is not an absolute right and only applies in certain circumstances. When processing is restricted, LION Pay is permitted to store the personal data, but not use it. An individual can make a request for restriction verbally or in writing. LION Pay will respond to a request within one calendar month. If we have shared your personal information with others, we will let them know about the restriction where possible. Upon request and where possible and lawful to do so, we will also let you know who we have shared your personal information with so that you can contact them directly.

- Data Portability

Under the General Data Protection Regulation (679/2016), you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or ask us to transfer this personal information to a third party of your choice.

- Objection

You can ask us to stop processing your personal information, and we will do so, if we are:

- ✓ relying on our own or someone else's legitimate interests to process your personal information unless if there is no legal reason for us to continue to hold or use it;
- ✓ processing your personal information for direct marketing purpose; or
- ✓ processing your personal information for research unless such processing is necessary for purpose of the public interest.

- Automated Decision-Making and Profiling

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your eligibility to use the services or has another significant effect on you, in some cases you have the right to ask that we do not make our final decision based solely on the automated decision, and you can also object to the automated decision and ask that someone reviews it. If you want to do this you will need to contact us, or use the contact information which will be provided to you once

you've received the automated decision.

How does LION Pay ensure the security of Personal Information?

LION Pay will implement physical, technical, and administrative measures to secure Personal Information from accidental loss, unauthorized access, use, alteration and disclosure. However, the safety and security of your information also depends on you.

Where LION Pay has given you (or where you have chosen) a password or access code which enables you to access certain parts of LION Pay's website/portal or mobile applications and similar, you are responsible for keeping this password and/or access code confidential. You should make sure that there is no unauthorized use. You therefore authorize LION Pay to act upon instructions and information received from any person that enters your user ID and password and you agree to be fully responsible for all use and any actions that may take place during the use of your account. You also agree to promptly notify LION Pay of any information you have provided which has changed.

Although LION Pay will take all reasonable steps such as the use of Secure Socket Layer (SSL) which is a leading security protocol for data transfer on the Internet to protect your Personal Information, the internet may not be completely secure, LION Pay cannot guarantee the security of your data transmitted to LION Pay's site; any transmission is at your own risk.

LION Pay security policy and standards ensure that staffs are trained and are aware of the importance of the policy, role-based access controls are in place to prevent unauthorised access to the information, secure archiving and deletion is taking place, security monitoring is taking place and that LION Pay is being compliant with industry regulation and legislation.

How long we will keep your Personal Information

We will keep your information for as long as is needed for the purposes set out above or as required by any laws that apply. Retention periods for transaction and other data categories may vary, depending on our obligations. For example, legal and regulatory compliance with anti-money laundering (AML) and KYC requirements, operational demands, business requirements or dates we assigned based on contracts will also need to be taken into account, and may require retention for a period of up to 7 years after the data was collected or after the merchant or other customer relationship has ended. After this time we will delete the information or anonymise the data so that it cannot be linked back to you.

30th November 2022

Changes and updates to the privacy notice

LION Pay may, from time to time, make changes to this Privacy Notice. The date the Privacy Notice was last modified is at the top of this notice. You are responsible for ensuring you periodically visit our Sites and Services and Privacy Notice to check for any changes. By continuing to use LION Pay Services, you agree to the changes in this Privacy Notice.

This notice is global in scope, the rights and obligations set out in this Privacy Notice will apply, subject only to amendment under any applicable local law having precedence.

Contact us

All comments, queries and requests relating to LION Pay's use of Personal Information are welcomed. Please contact LION Pay's Compliance Officer:

Compliance Officer
LION Payment UK Ltd.
Salisbury House
29 Finsbury Circus
London EC2M 5QQ
Email: lionpayment@lion-pay.com

If you are in the United Kingdom and have any queries or complaints about the processing of your Personal Information, you can also contact the Information Commissioner's Office [here](#).