

Data Privacy Notice

Worldline Merchant Services UK Limited

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1 Introduction

1.1 For Worldline (as defined in the definitions section at the end of this Privacy Notice), the protection of Personal Data is a topic of the utmost importance. Worldline is a company within the Worldline Group which provides Products and Services which allow Merchants to accept and be paid with electronic payment means. Therefore Processing of Personal Data is part of Worldline's core activities and accordingly compliance with the Data Protection Legislation is a key priority for Worldline.

1.2 This Privacy Notice aims at informing Data Subjects on the purposes, nature and scope of the various Processing activities Worldline carries out as a Controller when there is a contract between Worldline and a Merchant for the provision of Products and Services (e.g. acquiring services performed by Worldline within the frame of a contract entered into with a Merchant).

1.3 This Privacy Notice applies in addition to Worldline Group's general privacy notice and may be supplemented by additional privacy information provided in the context of specific Products and Services or when required by applicable laws.

2 Information Worldline Collects and its Sources

2.1 In the context of providing its Products and Services, Worldline processes Personal Data related to its Merchants' employees, legal representatives and/or persons with significant control. Worldline will process information related to its Merchants' Cardholders, even though Worldline may not have a direct relationship with them (e.g. when Cardholders perform transactions with the Merchants).

2.2 Cardholders may choose to share Personal Data directly with Worldline during the participation in one of its offers or promotions. In this case, service specific privacy information may be provided to the Cardholder.

2.3 Worldline processes the following categories of Personal Data:

2.3.1 Personal Data of Cardholders: e.g. Cardholder identification data (e.g. name, address), card data (e.g. card/PAN number, expiry date, card type, card issuer), transaction information (e.g. date/ time/ amount/ currency of transaction, authorisation code, transaction ID), account data (e.g. bank account number, issuer), device information (e.g. IP address, device ID). This information may be collected indirectly via our Merchants (e.g. Cardholder performs a transaction at one of our Merchants) or via the issuer of the payment instrument (e.g. authorisation code or in case of a chargeback).

2.3.2 Personal Data of the Merchant's employees or subcontractors, received directly from i) the employee or subcontractor themselves (e.g. during the provision of the Product and Services, day to day interaction and communication face to face or via electronic means between the employee or subcontractor and Worldline), ii) the Merchant (or the subcontractor's employer, where applicable) (e.g. contact persons in the contract, provided list of legal representatives and persons with significant control) or iii) third parties and public sources (e.g. information publicly available online, information received by credit scoring agencies, information available on public government registries), which includes (non-exclusive list):

- a) contact information: e.g. name, surname, address, email, telephone number;
- b) demographic information: e.g. birth date, gender, country of residence;
- c) business information: e.g. job title, company name, merchant ID, terminal ID, tax identification number, merchant category code (MCC), business address, individuals' affiliation with the legal entity, including the entity's legal representatives and persons with significant control;
- d) identification information: e.g. copies of national ID/passport and other documentation as required by applicable laws (including anti-money laundering and counter terrorism financing laws) in order to perform due diligence requirements (AML/KYC);
- e) banking, financial and transaction data: e.g. bank account details, revenue, information relating to the creditworthiness of the merchant, transaction history, volume/ velocity/ value/ details of transactions, chargebacks' volume;

- f) information Worldline collects from other public or private sources: e.g. information publicly available (information published publicly online, including interaction with Worldline's social media pages, company registries, regulatory filings, etc.), publicly available government databases (e.g. list of sanctioned persons), information received from private sources, such as fraud prevention agencies, data broker agencies (to the extent allowed by applicable laws).
- g) information Worldline collects from its websites: e.g. IP address, cookies, website forms. The website privacy statement and cookie policy will provide additional information on the relevant Processing of Personal Data in this context; and
- h) preferences: e.g. choices regarding marketing communications, purchasing history and preferences, language preferences.
- i) Special categories of Personal Data: e.g. biometric data (e.g. in case of online authentication and on the condition that this is allowed by applicable law or after having received explicit consent), data revealing political opinions (e.g. if a person is included in the list of politically exposed persons that Worldline has to consult in case of its compliance obligations when required by applicable laws).

3 Why does Worldline use the Personal Data?

3.1 Worldline processes Personal Data for the following purposes:

3.1.1 when it is necessary for i) the provision of the Product and Services with the Merchant and ii) managing its relationship with the Merchant (including processing the payment transactions, replying to requests for information, customer onboarding, making a commercial offer for entering into a contract, invoicing, providing security alerts, providing transaction information on the payment transactions executed, etc.).

3.1.2 For operational, regulatory, reporting and administrative purposes and for providing its Products and Services in an efficient, sustainable and compliant way, Worldline may share Personal Data with other members of Worldline Group on the basis of its legitimate interest to improve the efficiency of its operations, enhance security and reduce administrative costs (see also paragraph 4.3).

3.1.3 The processing of the Cardholders' data received from the Merchant in the context of providing the Products and Services to the Merchant is processed on the basis of Worldline's legitimate interest to provide the Products and Services to the Merchant in order for the electronic payment to be completed.

3.1.4 For the purpose of prevention of money laundering and terrorism financing, a due diligence analysis is carried out at regular intervals as mandated by applicable laws. Such due diligence may entail processing of Personal Data.

3.1.5 For the purpose of managing risk, detecting and preventing fraud and ensuring the security and business continuity of its operations on the basis of the Worldline Group's legitimate interests to protect its assets and promote safety and security on the payments market or on the basis to comply with applicable laws. Such operations include performing fraud and risk analysis, checking and updating the Payment Schemes' lists of terminated Merchants, auditing its systems, using real-time data for monitoring the performance of its systems and detect possible deficiencies or generate reports to assess performance and compliance with applicable service level agreements or regulatory requirements.

3.1.6 For the purpose of analysing and improving its Products and Services or developing new ones (e.g., Worldline may analyse the time required to facilitate Merchant requests or the availability of its services to assess and improve our performance or analyse the results and effectiveness of its Products and Services) on the basis of Worldline's legitimate interest to ensure the quality and improvement of its Products and Services and meet the Merchant's expectations and requirements.

3.1.7 For the purpose of market analysis, information services, business intelligence and research Worldline may analyse data, including transaction information (such as generating statistics, aggregated reports or analysis of market trends for internal or external use, benchmarking,) on the basis

of the Worldline Group's legitimate interest to improve their product offering, understanding market trends and predicting market behaviour. Worldline will take measures to ensure that its legitimate interest will not cause a risk for the rights and freedoms of the Data Subjects by implementing appropriate technical and organisational measures (e.g. anonymization, provision of aggregated reports to the Merchant that do not allow for the re-identification of the Data Subject).

3.1.8 For the purpose of contacting the Data Subjects with new relevant and personalised promotions and offers about Products and Services of Worldline in line with the Products and Services already used, or for the purpose of conducting surveys or requesting feedback, on the basis of Worldline's legitimate interest to promote its Products and Services, improve the quality of offered Products and Services and increase its revenue and on the condition that the Data Subject has not objected to such processing. When doing so, Worldline will always provide the Data Subject with the option to object/unsubscribe to such commercial communication. If direct marketing on the basis of legitimate interests is not allowed by applicable laws, Worldline will ensure that it has obtained the Data Subject's consent before processing the data for such purposes.

3.1.9 Worldline processes Personal Data on the basis of its own legal and regulatory obligations in order to comply with applicable laws and regulations (e.g. AML & KYC, tax, competition, labour, laws applicable to Worldline as a payment institution, accounting) and when requested by any judicial or governmental authority having or claiming jurisdiction over Worldline or Worldline's affiliates.

3.1.10 Worldline may record and monitor phone calls, on the basis of its legitimate interests, such as quality assurance, training, record keeping and being able to defend its legitimate interests and legal claims by retaining relevant evidence.

3.1.11 Finally, Worldline will process Personal Data in order to enforce its contractual or legal rights on the basis of its legitimate interest to protect its assets and recover any damage caused to Worldline by the Data Subject.

3.2 When Worldline is not able or cannot guarantee that the Personal Data will be processed for purposes included in this privacy notice or similar purposes according to the reasonable expectations of the Data Subject, it will seek to obtain the freely given, informed, specific and unambiguous consent of the Data Subject. The Data Subject shall always have the right to withdraw this consent.

4 Who does Worldline share Personal Data With?

4.1 Worldline will share Personal Data with its affiliates, financial institutions, Payment Schemes and other entities that are involved in the processing of electronic payment transactions for the purpose of delivering the Products and Services (e.g. during the processing of payment transactions, Worldline will transfer data to third parties, such as the Merchant, the issuer of the payment means and the Payment Scheme in order for the transaction to be completed). In this context, Worldline may transfer Personal Data outside the European Economic Area and/or the UK when this is necessary for the processing of the transaction (e.g. the issuing bank, Payment Scheme or the recipient of the payment is located in a country not part of the EEA or the UK). In these cases the aforementioned third parties act as independent Controllers and Worldline advises each Data Subject to carefully read their privacy notice in order to understand how their Personal Data will be processed.

4.2 Worldline will share the Cardholders' and transaction information with the Merchant and the Merchant's service providers (if any), i) whenever necessary (e.g. response code of the authorisation, information to be able to complete refund) and ii) for the purposes of detecting and preventing fraud and proving compliance with its contractual obligations.

4.3 Worldline may share Personal Data with members of the Worldline Group for operational, regulatory, compliance and reporting purposes on the basis of its legitimate interest to ensure business continuity, compliance, efficiency and cost reduction. For example, for security, efficiency or cost reduction purposes, Worldline may use common infrastructure and IT systems (e.g. hosting servers, backup systems, central customer databases) to which employees of other Worldline Group companies might have access.

4.4 Worldline will share Personal Data with professional advisors and third party providers that assist it with its regulatory, compliance and operational tasks (e.g. fraud prevention, monitoring, detection and analysis agencies, risk and credit reference agencies, anti-money laundering checks' providers, lawyers, accountants, debt collectors, external auditors, insurance providers).

4.5 Worldline will also share Personal Data with subcontractors or third-party providers that process Personal Data on its behalf, according to Worldline's instructions (e.g. customer support agencies, hosting providers, advertising agencies). Worldline will ensure that these entities provide adequate guarantees on the protection of Personal Data and are bound by written agreements to ensure the security of the Personal Data and the protection of rights and freedoms of Data Subjects.

4.6 Worldline will share Personal Data with business partners with which it combines its offered Products and Services for the purposes of executing the agreement, ensuring the quality and/or the commercial interests of the parties and complying with applicable standards and obligations. For example, if Worldline acts as a reseller of Products and Services performed by a third party, or offers Products and Services jointly with a business partner, Worldline may have to transfer Personal Data to such third party. In addition, Worldline might be required to share Personal Data with Payment Schemes to the extent required by Payment Scheme rules.

4.7 Worldline will disclose Personal Data to public authorities, government agencies and judicial authorities (i) if it is required to do so by law or legal process, (ii) when it believes disclosure is necessary to prevent harm or financial loss, (iii) in connection with an investigation of suspected or actual fraudulent or illegal activity, or (iv) when it is required for Worldline to defend itself against legal claims.

4.8 Applicable anti-money laundering and counter terrorism financing laws authorise Worldline to share Personal Data relating to suspicious reported transactions with other entities of the Worldline Group, and with other financial institutions, whenever such financial institution receiving this information is involved in the same transaction with the same Cardholder whose Personal Data is being shared.

4.9 Worldline may also disclose Personal Data in the event of a change of its legal or internal structure. For example, in case of a merger, reorganisation, acquisition, joint venture, bankruptcy, etc. Personal Data will be disclosed to the new entity formed (in case of a merger) or the new owner of Worldline (in case of change in control).

4.10 Worldline may anonymise Personal Data and share aggregated reports on the payment industry market with business partners, as long as Worldline has reasonably ensured that the Data Subject cannot be identified and that the further processing of these reports will not negatively impact the Data Subject.

5 International Data Transfers

5.1 Worldline may transfer Personal Data to third parties (in accordance with article 4 of the present notice) that may be located in countries other than the country where the Personal Data was collected, including countries outside the UK and EEA, where data protection and privacy laws or regulations may not be equivalent to the data protection and privacy laws and regulations in the UK. When the Personal Data is transferred to countries outside the UK, EEA or countries that have not been recognised to have an adequate level of protection as the UK, Worldline will either rely on a derogation applicable to the specific situation (e.g. when the transfer is necessary for the performance of a contract with the Data Subject or for the establishment, exercise or defence of a legal claim) or ensure that adequate safeguards have been put in place to ensure the protection of the Personal Data processed in accordance with the applicable legislation (e.g. using specific contractual clauses approved for use in the UK). Please contact Worldline using the contact details provided in paragraph 11 for further information.

6 Data Subject Rights

6.1 As a Data Subject, the Cardholders, or the members of Merchant's staff have, in accordance with the Data Protection Legislation, the right of information, access, rectification, deletion, restriction, objection to processing and data portability. The Data Subject can direct such a request to Worldline's Data Protection Officer at dpo-rbub@worldline.com. For the protection of the privacy of Data Subjects, Worldline will be required to verify the identity of the Data Subject before taking actions to address the request.

6.2 In case a request is made by a Cardholder, Worldline may not be able to identify the Cardholder based on the information received indirectly from the Merchants in the context of the transaction processing. In these cases Worldline advises the Cardholder to contact the Merchant in order to exercise their rights.

6.3 When the processing of Personal Data is based on Worldline's legitimate interests, including processing for profiling and direct marketing purposes, the Data Subject shall have the right to object at any time to the

processing of Personal Data concerning them by contacting Worldline using the contact details provided above. In such case, Worldline shall no longer process the Personal Data unless i) Worldline demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or ii) such data is used within the context of legal claims or proceedings.

6.4 The Data Subject can refuse the recording or monitoring, by Worldline, of their telephone conversations with Worldline's customer support team.

6.5 Under applicable laws, Worldline may be prohibited to disclose specific information to the Data Subject (e.g. prohibition of informing about money laundering or terrorist financing analysis or reporting of suspicious transactions to the competent regulator according to applicable anti-money laundering laws, prohibition of informing about tax law investigations by tax authorities, processing of personal data carried out by Worldline as an operator of essential services which is carried out in compliance with the applicable regulations, etc.).

6.6 The Data Subject whose Personal Data are processed on the basis of anti-money laundering laws may not have the right (i) to access and correct their data, (ii) to be forgotten, (iii) to portability of such data, (iv) to object, (v) not to be profiled, or (iv) to the notification of security failures. In these cases, applicable national laws may foresee alternative mechanisms for the Data Subject to exercise their rights.

6.7 In cases of processing activities based on the Data Subject's consent, the Data Subject's consent may be withdrawn at any time by contacting Worldline using the contact details provided in paragraph 11.

6.8 The Data Subject has the right to lodge a complaint with the UK Information Commissioner Office, if they consider that one of the processing activities of Worldline is not in compliance with the Data Protection Legislation or Worldline failed to address its Data Subject requests adequately.

7 Does Worldline carry out Automated Decision-Making?

7.1 The processing of electronic payments by Worldline is carried out via automated means. This processing is necessary for the performance of the contract Worldline has with the Merchant. The processing of Cardholders' data in this context is based on Worldline's and the Merchant's legitimate interest to process the electronic payment efficiently, securely and quickly. If an electronic payment transaction was not initiated by the Cardholder, one of these options should be followed: i) either the Merchant follows the refund process by contacting Worldline, or ii) the Cardholder follows the chargeback process with the issuer, in each case in accordance with applicable legislation, Payment Scheme rules and if applicable the Merchant contract with Worldline.

7.2 In the context of entering into or executing a contract, Worldline may carry out processing based on automated decision making. For example, Worldline may rely on automated decision making for fraud detection, analysis and monitoring purposes by defining specific parameters that may mark an electronic payment transaction as fraudulent (e.g. based on the amount, origin or volume of transactions). Similarly, in order to comply with applicable laws, including anti-money laundering and counter terrorism financing laws, Worldline may rely on automated decision making in order to decide whether to enter into a contract (e.g. if the name the counterparty is included in a government list of sanctioned persons). In such cases, the Data Subject has the right to contact Worldline to express their point of view and to contest the decision.

8 Retention period

8.1 Worldline will retain the Personal Data for as long as necessary to deliver the Products and Services during its contract with the Merchant. At the end of the contract with the Merchant, Worldline may retain the Personal Data for the period of time determined in accordance with i) the industry standards and applicable legislation (for example, transaction information may be retained for a period of up to 10 years after the date of transaction, information about the merchant may be retained for a period of up to 10 years after the termination of the contract in accordance with retention periods defined by anti-money laundering and counter terrorism financing legislation, tax law, contractual law, etc) and ii) its legitimate business interest, unless prohibited by law.

9 How does Worldline protect my Personal Data?

9.1 Worldline implements appropriate technical and organisational measures to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of processing, in accordance

with the Data Protection Legislation. Worldline demonstrates its adherence to such technical and organisational measures by maintaining, amongst other things, compliance with the Payment Card Industry Data Security Standard (PCI DSS). For further information, [see the details of the Technical and Organisational Measures on the Worldline website.](#)

10 Do I have to provide my Personal Data?

10.1 The Products and Services provided by Worldline to the Merchants require Personal Data to be processed. Without such Personal Data, Worldline will not be able to enter into nor perform contracts with Merchants. Cardholders need to be aware that when processing an electronic payment transaction, the Personal Data referenced in paragraph 2.3 must be provided and processed in order for Worldline to successfully process the transaction.

11 Contact details

11.1 For any further information, request or complaint concerning the processing of Personal Data, please contact Worldline's Data Protection Office by email at dpo-rbub@worldline.com.

11.2 If you would like to exercise any of your rights listed in this Privacy Notice, you should first fill in the Data Subject Request webform designed for that purpose. You can access it here: [Data Subject Request Form](#)

12 Updates To This Privacy Notice

Worldline may update this Privacy Notice from time to time in order to provide the Data Subjects with up-to-date and transparent information on its data processing activities. Data Subjects can at any time find the latest version of this Privacy Notice on Worldline's website.

13 Definitions

- **Worldline Group:** means Worldline (as defined below), any subsidiary or holding company of Worldline, and any subsidiary from time to time of a holding company of Worldline.
- **Worldline:** is Worldline Merchant Services UK Limited, a payments institution authorised by the United Kingdom Financial Conduct Authority (FRN 978429), registered at Companies House with company number 14162517 and having its registered address at 1 Beeston Business Park, Technology drive, Beeston, Nottingham, NG9 1LA UK.
- **Payment Scheme:** the card and alternative payment means networks that enable the execution of payment transactions including the set of rules, practices, standards and/or implementation guidelines. Examples are Visa, MasterCard and Alipay.
- **Data Protection Legislation:** any applicable law relating to the processing, privacy and use of personal data as relevant to the contract between Merchant and Worldline, which include, but are not limited to, the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended, the General Data Protection Regulation (EU) 2016/679 as implemented within the UK ("UK GDPR") and/or any corresponding or equivalent law or regulation.
- **Controller, Data Subject, Personal Data:** these terms shall have the same meaning as the definition given to them in UK GDPR.
- **process:** shall have the same meaning as the definition given to it in UK GDPR and **processed** and **processing** shall be interpreted accordingly.
- **Cardholder:** a user of a debit card, credit card or any other cashless payment means making an electronic payment with a Merchant, such payment being then processed by Worldline.
- **Products and Services:** the products and services provided by Worldline to a Merchant as included in the contract and subject to changes from time to time.
- **Merchant:** a company which has signed a contract with Worldline for the provision of Products and Services.