

# digitalgiftcard.com Data Privacy Notice

Effective as of March 2020

In this privacy notice we explain how we collect and use your personal information that we obtain when you visit our website [www.digitalgiftcard.com](http://www.digitalgiftcard.com) (the “Website”).

## 1. Who we are

This Data Privacy Notice applies to [www.digitalgiftcard.com](http://www.digitalgiftcard.com), a service provided by epay Limited (“epay” “we”, “our” or “us”). , which is a subsidiary of Euronet Worldwide, Inc. “Euronet”, ).

epay Limited is committed to the privacy and security of your Personal Data. This Notice describes how we collect and use Personal Data, in accordance with the law and our standards of ethical conduct.

epay Limited at Kingfisher House, 2 Woodbrook Crescent, Billericay Essex, United Kingdom CM12 0EQ, will be the “data controller” in relation to any Personal Data provided to it directly via the website [www.digitalgiftcard.com](http://www.digitalgiftcard.com) (the “Website”). This means that epay Limited is responsible for deciding how it will hold and use Personal Data about you.

Our Data Protection Officer is Yago Amat Martínez and can be contacted by email at [yamat@euronetworldwide.com](mailto:yamat@euronetworldwide.com), [DPO@euronetworldwide.com](mailto:DPO@euronetworldwide.com) or [DPO\\_UK@epayworldwide.com](mailto:DPO_UK@epayworldwide.com).

By using or navigating the Website, you acknowledge that you have read, understand, and agree to be bound by this Notice. We encourage you to review and check the Website regularly for any updates to this Notice. We will publish the updated version on the Website and by continuing to deal with us, you accept this Notice as it applies from time to time.

## 2. Data Protection Principles

“Personal data” means any information data that enables us to identify you, directly or indirectly, such as your name, email, address, telephone number, any form of identification number or one or more factors specific to your physical, physiological, mental, economic, cultural or social identity.

We are committed to complying with applicable data protection laws and will ensure that your Personal Data is:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

### **3. What data do we collect?**

**Personal Data You Give Us.** The types of Personal Data we collect depends on the products or services you have requested from us. We may collect and process the following Personal Data:

- Personal details, such as data which may identify you. This may include name, prefix, alias, email, phone number; and
- Customer Service details, such as customer preferences, customer requests, online shopping cart, purchases, purchase history/order records, transaction time stamp.

**Cookies and similar technologies.** When you use our website, we may collect information via functional identifier cookies, including the IP address of visitors, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. The use of these functional identifier cookies is strictly necessary for proper website functionality.

For more information please read our cookie policy.

### **4. What is done with the data collected?**

We use Personal Data and other data you provide to us to complete your transactions or other requests, to attempt to prevent fraudulent transactions, to improve the content of our websites and services in order to enhance your experience and to contact you when necessary.

We may also process your personal data in order to pursue any legal claims, as well as for archival purposes related to this purpose, including securing information in the event of the need to prove facts about the services provided in the appropriate proceedings.

We may sometimes process your personal data, in order to provide targeted marketing about our services. Such marketing communications will only be sent to you if you gave your consent (when you registered for our services or at another point) and you have not withdrawn such consent or if there is another basis to send such communications to you. All marketing emails you receive from us will include specific instructions on how to unsubscribe and you may unsubscribe at any time or alternatively you can unsubscribe from marketing at any time by contacting us in writing by email at [uk.support@uk.epayworldwide.com](mailto:uk.support@uk.epayworldwide.com).

## **5. Is data collected shared with third parties?**

epay Limited will share your Personal Data with our agents, processors, or contractors in order to complete your transactions or provide other services that you have requested. epay Limited will share Personal Data with Euronet Worldwide, Inc. and its affiliates for the purposes of this Notice.

You should note that epay Limited is opposed to third-party spam mail activities and does not participate in such mailings, nor do we release or authorize the use of customer data to third parties for such purposes.

We may share data we collect with third party service providers to manage certain aspects of the services we provide, such as maintaining our servers and processing or fulfilling orders for transactions and services. We ensure that the third party service providers that we share your data with have privacy policies in place substantially similar to our own.

We may transfer your data to a third party as a result of a sale, acquisition, merger, or reorganization involving Euronet Worldwide, Inc., its subsidiaries, or any of their respective assets.

We may also disclose your Personal Data in special cases if required to do so by law, court order, or other governmental authority, or when we believe in good faith that disclosing this data is otherwise necessary or advisable, such as to identify, contact, or bring legal action against someone who may be causing injury to – or interfering with – the rights or property of epay Limited, the services, another user, or anyone else that could be harmed by such activities (for example, identify theft or fraud).

## **6. How long is data retained?**

Personal Data is used for different purposes, and is subject to different standards and regulations. In general, Personal Data is retained for as long as necessary to provide you with services you request, to comply with applicable legal, accounting or reporting requirements, and to ensure that you have a reasonable opportunity to access the Personal Data.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For example:

- Legal and regulatory requirements. We will retain your personal data if required to comply with legal and regulatory obligations, compliance procedures and legal limitation periods.
- Customer service. If you provide us with your personal data, we may (subject to any legal or regulatory considerations) retain your personal data for as long as necessary to deal with your query, for as long as you have an account with us in order to meet our contractual obligations to you, and for six years after that to identify any issues and resolve any legal proceedings. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services.
- Marketing. Personal data provided to us for marketing purposes may be retained until you opt out or until we become aware the data is inaccurate.
- Processing a transaction. Purchaser and recipient data is stored for 90 days from the date of collection.

In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

epay Limited retains Personal Data for the minimum periods required by applicable law. You may obtain a Personal Data retention schedule by contacting epay Limited's Data Protection Officer.

## **7. Is correspondence that you send to us saved?**

Yes. If you send us correspondence, including e-mails and faxes, we may retain such data along with any records of your account. We may also retain customer service correspondence and other correspondence involving you, epay Limited, our partners, and our suppliers. We will retain these records in line with our Retention Policy in order to provide you with services you request, to measure and improve our customer service, and to investigate potential fraud.

## **8. Data Security**

We are committed to maintaining the security of your Personal Data and have measures in place to protect against the loss, misuse, and alteration of the data under our control.

We employ the latest and most secure techniques available for protecting our systems from intrusion by unauthorized individuals, and we are constantly upgrading our security as better methods become available.

Our datacentres and those of our partners utilise state-of-the-art physical security measures to prevent unauthorized access to the facility. In addition, all Personal Data is stored in a secure location behind firewalls and other sophisticated security systems with limited (need-to-know) administrative access.

All epay Limited employees who have access to, or are associated with, the processing of Personal Data are contractually obligated to respect the confidentiality of your data and abide by the privacy standards we have established.

Please be aware that no security measures are perfect or impenetrable. Therefore, although we use industry standard practices to protect your privacy, we cannot (and do not) guarantee the absolute security of Personal Data.

## **9. Does this Notice apply to other websites?**

No. The [www.digitalgiftcard.com](http://www.digitalgiftcard.com) website may contain links to other Internet websites. By clicking on certain other links, you will be redirected to such third-party websites. We are not responsible for the privacy policies of other websites or services. You should make sure that you read and understand any applicable third-party privacy policies, and you should direct any questions concerns to the relevant third-party administrators or webmasters prior to providing any Personal Data.

## **10. What are my data protection rights?**

Subject to verification of your identity, you may request access to and have the opportunity to update and amend your personal data. You may also exercise any other rights you enjoy under applicable data protection laws.

Data Subjects in the European Economic Association have the right to:

- Request access to any Personal Data we hold about you (“Subject Access Request”) as well as related data, including the purposes for processing the Personal Data, the recipients or categories of recipients with whom the Personal Data has been shared, where possible, the period for which the Personal Data will be stored, the source of the Personal Data, and the existence of any automated decision making;

- Obtain without undue delay the rectification of any inaccurate Personal Data we hold about you.
- Request that Personal Data held about you is deleted provided the Personal Data is not required by epay Limited for compliance with a legal obligation under applicable law or for the establishment, exercise or defence of a legal claim.
- Under certain circumstances, prevent or restrict processing of your Personal Data, except to the extent processing is required for the establishment, exercise or defence of legal claims; and
- Under certain circumstances, request transfer of Personal Data directly to a third party where this is technically feasible.

Also, where you believe that epay Limited has not complied with its obligations under this Notice or the applicable law, you have the right to make a complaint to a relevant Data Protection Authority or through the courts. Although not required, we would encourage you to let us know about any complaint you might have, and we will respond in line with our Complaints Procedure set out in Section 11 of this Notice.

## **11. Complaints Procedure**

Where you believe that epay Limited has not complied with its obligations under this Notice, or the applicable law, you have the right to make a complaint to a Data Protection Authority or through the courts.

Although not required, we would encourage you to let us know about any complaint you might have and we will respond in line with our Complaints Procedure.

Complaints or concerns can be lodged with our privacy team:

- Using email at: [DPO\\_UK@epayworldwide.com](mailto:DPO_UK@epayworldwide.com) or [DPO@euronetworldwide.com](mailto:DPO@euronetworldwide.com)
- In writing to: Data Privacy Office epay Limited  
Kingfisher House, 2 Woodbrook Crescent  
Billericay Essex, United Kingdom CM12 0EQ  
or to  
Euronet Data Protection Officer, Calle Cantabria, 2, 28108  
Alcobendas, Madrid, Spain

epay Limited employees are required to direct any privacy-related complaints or concerns to our privacy team in the same manner.

epay Limited will aim to send an acknowledgement within 7 days of receipt of the complaint/concern.

epay Limited will conduct an investigation in accordance with relevant laws and will aim to respond substantively within 28 days of receipt of the complaint/concern.

If further time is required to investigate your complaint/concern, epay Limited will write to you within 28 days of receiving the complaint/concern, informing you of the investigation timeline which will be no longer than an additional two months for the complaint procedure to be concluded.

In the case of a rejection of the complaint, epay Limited will provide you with a written explanation for the rejection.

If the complaint/concern is considered justified, epay Limited will take reasonable steps to try to address the complaint/concern to your reasonable satisfaction.

If you are not satisfied with the reply/outcome, or otherwise with the handling of the complaint, you have the right to lodge a claim before the court or a relevant Data Protection Authority.

## **12. Contact Us**

If you have any questions or concerns about this Notice or epay Limited data practices, please contact our privacy team:

- Using email at: [DPO\\_UK@epayworldwide.com](mailto:DPO_UK@epayworldwide.com) or [DPO@euronetworldwide.com](mailto:DPO@euronetworldwide.com)
- In writing to: Data Privacy Office epay Limited  
Kingfisher House, 2 Woodbrook Crescent  
Billericay Essex, United Kingdom CM12 0EQ  
or to  
Euronet Data Protection Officer, Calle Cantabria, 2, 28108  
Alcobendas, Madrid, Spain

Any complaints will be handled in line with our Complaints Procedure as set out in Section 11 of this Notice.