

## PRIVACY NOTICE

### 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

### 2. Responsibilities

The GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Loyaltek SA collecting/processing their personal data.

All Employees/Staff of Loyaltek SA who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### 3. Privacy notice

#### Who are we?

Loyaltek SA is an electronic payment company.

The personal data we may collect is:

Personal data type	Source
Business Email & Contact details	Standard Business Activities / AML - Legal obligations
Business Job Description	Standard Business Activities
Personal information and details	Standard Business Activities / AML - Legal obligations
Bank / Transaction information	AML Regulations / Legal obligations
CVs etc	Recruitment Activities
Employment Information	From old\existing staff - Legal obligations
Website Info	From Marketing Activities

The personal data we collect will be used for the following purposes:

- Standard Business Activities
- Staff Employment Information

Our legal basis for processing for the personal data:

- Standard Business Activities
- AML Regulations / Legal obligations

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Standard Business Activities

The special categories of personal data concerned are:

- None

## Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is not always required for Loyaltek SA to process specific types of personal data. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time by withdrawing consent.

## Disclosure

Loyaltek SA will not pass on your personal data to third parties.

## Retention period

Loyaltek SA will process personal data for standard business processes and will store the personal data for the retention period.

## Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- *Right of access* - you have the right to request a copy of the information that we hold about you.
- *Right of rectification* - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- *Right to be forgotten* - in certain circumstances you can ask for the data we hold about you to be erased from our records.
- *Right to restriction of processing* - where certain conditions apply to have a right to restrict the processing.
- *Right of portability* - you have the right to have the data we hold about you transferred to another organisation.
- *Right to object* - you have the right to object to certain types of processing such as direct marketing.
- *Right to object to automated processing, including profiling* - you also have the right to be subject to the legal effects of automated processing or profiling.
- *Right to judicial review*: in the event that Loyaltek SA refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the clause hereunder.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Loyaltek SA or how your complaint has been handled, please contact us at [support@loyaltek.com](mailto:support@loyaltek.com).

### 4. Online privacy statement

## Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject');

an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

#### How we use your information

This privacy notice tells you how we, Loyaltek SA, will collect and use your personal data for standard business activities.

#### Why does Loyaltek SA need to collect and store personal data?

In order for us to provide you our services we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes Loyaltek SA would contact you for additional consent.

#### Will Loyaltek SA share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Loyaltek SA in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Loyaltek’s procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

#### How will Loyaltek SA use the personal data it collects about me?

Loyaltek SA will process (collect, store and use) the information you provide in a manner compatible with the EU’s General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Loyaltek SA is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

#### Under what circumstances will Loyaltek SA contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

#### Can I find out the personal data that the organisation holds about me?

Loyaltek SA at your request, can confirm what information we hold about you and how it is processed. If Loyaltek SA does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Loyaltek SA or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Loyaltek accepts the following forms of ID when information on your personal data is requested: Passport.