

SECURE TRADING LIMITED

SECURETRADING LIMITED EU PRIVACY NOTICE FOR OUR MERCHANTS AND OTHER BUSINESS RELATED PERSONAL DATA

1. Who is responsible for processing your data?
 2. Categories and Sources of Personal Data and Purposes and Lawful Basis for Processing.
 3. Sharing of Your Information
 4. Transfers of Personal Data outside the EEA
 5. Your Rights
 6. Retention Period
-

1 WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA AND HOW TO CONTACT US

This notice (“**Notice**”) describes the steps Securetrading Ltd (“**STL**”, “**we**” or “**us**”) takes to protect the personal data that we process about merchants (our customers) and other business related personal data.

STL is committed to the protection of the personal data that we process about you in line with the data protection principles set out in the European Union’s (“**EU**”) General Data Protection Regulation 2016/679 (“**GDPR**”).

The controller in respect of your personal data is Securetrading Limited of European Operations Centre, Parc Menai, Bangor, Gwynedd, UK LL57 4BL.

You can contact us using the following email address: gdpr@securetrading.com

2 WHAT PERSONAL DATA WE COLLECT AND WHY?

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting the personal data that we process.

In each of the sections listed below, we describe how we obtain your personal data and how we will treat it.

Section 2.1 Representatives of our Existing or Prospective Merchants and Vendors

Section 2.2 Visitors to our Premises

Section 2.3 Website Visitors

2.1 Representatives of our Existing or Prospective Merchants and Vendors

A - Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly,
- b) from a company that employs you, if you are an employee of our merchants,
- c) from affiliates of STL;
- d) during networking events that we have either hosted, or sponsored, or attended; and/or

- e) from publicly available sources (for example, your company website or social media sites and company registrars)

B - Personal data that we collect and process

We may collect the following categories of personal data relating to employees, officers, authorised signatories and other associated individuals of our merchants and vendors. This may include:

- a) name;
- b) business address;
- c) business email address;
- d) business telephone number;
- e) job title

For the purposes of anti-money laundering requirements, we may also collect the following:

- a) name;
- b) date of birth;
- c) address;
- d) information from utility bills;
- e) copies of passports;
- f) copies of driving licences;
- g) nationality;
- h) bank details (account numbers, sort codes);
- i) police contact certificate (occasional use).

C - Why do we collect your personal data and what are our lawful bases for it?

Representatives of our Existing or Prospective Merchants and Vendors		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Provide you with our products or services or receive products or services from you	Legitimate Interest	Efficiently fulfil our contractual and legal obligations Management reporting (including at an intra-group level)
Establish and manage our relationship		Efficiently fulfil our contractual and legal obligations Account Management Exercise or defend legal claims Understand the market in which we operate Management reporting (including at an intra-group level)
Learn about how our products and services are or may be used		Understand the market in which we operate

		Management reporting (including at an intra-group level)
Manage security		Managing security, risk and crime prevention, including anti-money laundering Management reporting (including at an intra-group level)
Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our products and services Management reporting (including at an intra-group level)
Anti-money laundering and sanctions lists	Legal obligation	Managing risk, prevention of crime and anti-money laundering

If you object to us using your contact details for these purposes, including direct marketing, please send an email to us using the following email address: gdp@securetrading.com

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

2.2 Visitors to Our Premises

A - Sources of personal data

We may obtain your personal data from you directly and/or from our systems' records.

B - Personal data that we collect and process

- a) name;
- b) business contact details;
- c) organisation;
- d) role; and/or
- e) image (for example, from CCTV cameras at our premises)
- f) car registration number

C - Why do we collect your personal data and what are our lawful bases for it?

Visitors to our Premises		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Manage security	Legitimate Interest	Managing security, risk and crime prevention

Maintain records of visitors to our premises		Management reporting
--	--	----------------------

If you object to us using your personal data for these purposes, please send an email to us using the following email address: gdpr@securetrading.com

2.3 Website Visitors

A - Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly (for example, by filling in forms on the website.
- b) when you register to use the website;
- c) subscribe to any of our services;
- d) request further information via the website
- e) when you report a problem with the website;
- f) from your device or browser; and/or
- g) if you contact us, we may keep a record of that correspondence.

B - Personal data that we collect and process

- a) name;
- b) username;
- c) email address;
- d) phone number;
- e) postal address;
- f) bank details;
- g) job title;
- h) operating system;
- i) browser type;
- j) login information;
- k) full Uniform Resource Locators (URL);
- l) products or services you viewed or searched for;
- m) other website data, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- n) cookie data (for more information please see our Cookie Notice <https://www.securetrading.com/wp-content/uploads/2018/07/STL-Final-cookie-policy-GD.pdf>)
- o) preferences regarding online marketing; and/or
- p) IP address.

C - Why do we collect your personal data and what are our lawful bases for it?

Website Visitors		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Provide our website services to you	Legitimate Interest	Website management Promote our products and services Account management Notifying you of any changes to our products and services Provide you with password reminders Notify you that a particular service has been suspended for maintenance
Establish and manage our relationship		Understand the market in which we operate Management reporting (including at an intra-group level) Account management Make suggestions and recommendations to you about products or services that may interest you
Learn about our websites(s) users' browsing patterns and the performance of our website(s)		Website management, including troubleshooting, data analysis, testing, research, statistical and survey purposes
Manage security		Managing security, risk and crime prevention Management reporting (including at an intra-group level)
Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our products and services Management reporting (including at an intra-group level) Make suggestions and recommendations to you about products or services that may interest you

Learn about how our products or services may be used		Understand the market in which we operate Management reporting (including at an intra-group level)
--	--	---

If you object to us using your personal data for these purposes, including direct marketing, please send an email to us using the following email address: gdpr@securetrading.com

We will seek your prior consent, where required to do so by law, where we:

- a) use cookies or similar technologies to fulfil this purpose; and/or
- b) use your email to communicate marketing information to you.

3 WHO DO WE SHARE YOUR PERSONAL DATA WITH

We do not sell your personal data to third parties.

Affiliates

We may share your personal data with our affiliates, by which we mean a person or entity that directly or indirectly controls, is controlled by, or is under common control with, STL. “Control,” for purposes of this definition, means direct or indirect ownership or control of more than 50% of the voting interests of the subject entity.

Our Service Providers

We may disclose information about you to organisations that provide a service to us, on the understanding that they will keep the information confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of service providers:

- a) technical support providers who assist with our website and IT infrastructure;
- b) third party software providers, including ‘software as a service’ solution providers, where the provider hosts the relevant personal data on our behalf;
- c) professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers;
- d) providers that help us generate and collate reviews in relation to our products and services;
- e) our advertising and promotional agencies and consultants and those organisations selected by us to carry out marketing campaigns on our behalf; and/or
- f) providers that help us store, collate and organise information effectively and securely, both electronically and in hard copy format, and for marketing purposes.

Company Mergers and Takeovers

We may transfer your personal data to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event we decide to dispose of all or parts of our business.

4 TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EUROPEAN ECONOMIC AREA

If and when transferring your personal data outside the EU or European Economic Area (“EEA”), we will only do so using one of the following safeguards:

- g) the transfer is to a non-EEA country that has been the subject of an adequacy decision by the EU Commission;

- h) the transfer is covered by a contractual agreement, which covers the GDPR requirements relating to transfers to countries outside the EEA;
- i) the transfer is to an organisation which has binding corporate rules approved by an EU data protection authority; or
- j) the transfer is to an organisation in the US that is EU-US Privacy Shield certified.

International transfers to our affiliates are governed by EU Commission-approved Standard Contractual Clauses for Controllers and, where relevant, for Processors.

We may also transfer your data to third-party vendors outside the EU, such as our customer relationship management system and due diligence providers. Where we do so, the Standard Contractual Clauses or other safeguards approved by the EU Commission are in place to safeguard that personal data.

Copies of these agreements may be obtained by contacting us using the following email address: gdpr@securetrading.com

5 YOUR RIGHTS

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- **Request access to personal data about you** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- **Request rectification, correction, or updating to any of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request personal data provided by you to be transferred in machine-readable format (“data portability”).**
- **Request erasure of personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- **Request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- **Object to the processing of your personal data in certain circumstances.** This right may apply where the processing of your personal data is based on the legitimate interests of STL, as explained above, or where decisions about you are based solely on automated processing, including profiling.
- **Right to lodge a complaint.** You also have the right to lodge a complaint with the data protection supervisory authority, if you are not happy with how we Process your Personal Data.

These rights are not absolute and are subject to various conditions under:

- applicable data protection and privacy legislation; and
- the laws and regulations to which we are subject.

If at any time you decide that you do not want to be contacted for any purpose or if you would like to exercise any of your rights as set out above, you can contact us by emailing the following email address: gdpr@securetrading.com

6 RETENTION PERIOD

We will keep and process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defense of legal claims.