

VYBE PRIVACY POLICY

Last Updated on 17/08/2020

WELCOME TO VYBE'S PRIVACY POLICY

INTRODUCTION

This policy applies to personal information that we collect when you use and interact with our website and register for our service. This privacy policy tells you how we look after your personal data and tells you about your privacy rights and how the law protects you.

We strive to ensure your privacy and online safety is at the forefront of the services and products we provide. We try to only collect the data that is necessary to use, operate and support applications for the Vybe card and future services and product offerings.

If you have any questions or concerns about our use of your personal information, then please contact us by using the contact details provided at the bottom of this policy.

QUICK LINKS

We recommend you read this privacy policy in full to ensure you are fully informed. However, if you only want to access a particular section of this policy then you can click through a specific area by clicking on the relevant link set out below.

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1 IMPORTANT INFORMATION AND WHO WE ARE

Vybe SAS is the controller and responsible for your personal data (referred to as “Vybe”, “we”, “us” or “our” in this privacy policy).

Vybe SAS company incorporated in France which is registered at the Paris Commercial Registry under number 853297905 with offices at 66 rue des Archives, 75003 Paris, France.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2 WHAT KIND OF DATA DO WE COLLECT?

Personal data, or personal information, means information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect personal information in a couple of different ways – directly and indirectly.

(a) Personal information we collect directly from you which you provide voluntarily

We directly collect personal information if you send an enquiry to us from our website or through our app when to register an application for an account with us or refer another applicant to us or get in touch with us by email or phone. The personal data we may collect includes:

Identity Data, such as your first name, last name, username or similar identifier

Contact Details, such as your telephone number and email address;

(b) Personal information we collect indirectly from you usually by automatic means

When you visit and interact with our website and/or use our services we may collect certain information automatically from your device or equipment. This data may include:

Browser and hardware data, such as IP address, type of device, operating system, browser type, screen resolution, language, device make and model, as well as the versions of the above-mentioned services.

Cookie and tracking technology data, which would include pages visited, time spent on pages, broad geographical location (e.g. country or city level location), language preferences, and other anonymous traffic data.

Collecting this information enables us to better understand our subscribers and visitors who come to our website and our subscribers use of our service, in particular which content and services are of interest to them. We use this information on an aggregated basis for internal analytical purposes and to improve the quality and relevance of our website and products and services.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3 HOW DO WE USE THIS INFORMATION?

We will only use your personal information when the law allows us to. Most commonly we will use your personal information in the following circumstances:

- (a) where we need to perform the contract we are about to enter into or have entered into with you;
- (b) where it is necessary for our legitimate interests (or those of a third party) and your interest and fundamental rights do not override those interests);
- (c) where we need to comply with a legal or regulatory obligation.

4 PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|--|---|
| To register you as a new applicant | (a) Identity (b) Contact | Performance of a contract with you |
| To manage our relationship with you which will include Notifying you about changes to our terms or privacy policy | (a) Identity (b) Contact (c) Profile | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To use data analytics to improve our website, products/services, marketing, customer | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to |

| | | |
|-------------------------------|--|--|
| relationships and experiences | | develop our business and to inform our marketing strategy) |
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Cookies

We use cookies and similar tracking technology. A cookie is a small amount of data, which often includes a unique identifier that is sent to your device browser and is stored on your device. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information on the cookies we use, please see https://vybecard.com/en-gb/vybe_cookie_policy.pdf.

5 CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider we need to use it for another purpose and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so, otherwise we will ask you your consent.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6 DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with:

- (a) Vybe SAS, our parent company and other companies in the Group.
- (b) our third party service providers and partners who provide data processing services to us (for example, to support the delivery of, monitor, enhance the security and user experience of our services or website) or who otherwise process personal information for purposes that are described in this policy or notified to you when we collect your personal information.
- (c) law enforcement agencies, regulatory authorities, courts or other public authorities where we have a legal obligation to do so.

We require all Vybe SAS and any third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7 IS MY PERSONAL INFORMATION SECURE?

We take security seriously. We take appropriate measures to ensure that the information we collect and maintain is kept secure, accurate and up to date and only kept for so long as is necessary for the purposes for which it is used.

In the unlikely event that there is a breach and your personal information is at risk, you will be notified within 72 hours of discovering the breach. You will be informed of what information is

at risk, steps that we have taken to ensure your safety, and what we have do to rectify the breach.

8 TRANSFER OF PERSONAL DATA

The personal data collected by Vybe is stored on our servers, which are located on the EEA. We will not transfer your personal data outside the EEA.

If in the future, in order to meet the purposes set out in this Privacy Policy, personal data is transferred outside EEA, it will be in countries that the level of protection is recognised as equivalent by the European Commission. We will undertake and ensure that security measures and safeguards are in place to protect your information and to ensure that all transfers of your information comply with applicable data protection regulation.

9 DATA RETENTION

How long will you use my personal data for?

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see <https://vybecard.com/en-gb/tos.pdf> below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Personal data related to prospects are kept for two years since their registration.

10 CAN I ACCESS, CORRECT OR DELETE INFORMATION ABOUT ME?

You can request to see what personal information we hold about you at any time.

If you think there's a problem with the personal information we hold about you we will resolve it if necessary.

If you want us to delete your personal information, we will take all reasonable steps to do so unless we need to keep it for legal, auditing or internal business purposes.

11 OUR POLICY TOWARD CHILDREN

Applications for a Vybe card are directed to individuals who are not less than 13 years old.

We do not knowingly collect personal information from children under the age of 13.

If you become aware that a child has provided us with personal information, please contact us at contact.uk@vybecard.com.

12 CHANGES TO THIS POLICY

We may review and amend this Privacy Policy from time to time. We will post updated versions of the Privacy Policy on our website.

13 YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (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 correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your 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 your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at contact.uk@vybecard.com

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a

security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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QUESTIONS OR COMPLAINTS

If you have any questions or complaints about our privacy policy or the way we handle your personal information, you can contact us at contact.uk@vybecard.com or by mail to Vybe SAS 66 rue des Archives, 75003 Paris, France