



PRIVACY STATEMENT OF TIBBAA SMARTCARD

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This is the privacy statement of TIBBAA SMARTCARD B.V. Under the terms and conditions of this privacy statement personal data is collected with respect to the TIBBAA SMARTCARD.

TIBBAA SmartCard B.V. Privacy Policy and its affiliates ("TS", "us", "we", "our") are committed to protecting the privacy of our customers' personal information. Our Privacy Policy together with the "Use of Your Information" section of our Terms & Conditions are designed to inform you about the information we collect, how we use and share it, and your options with regard to that collection and use. The term "card" refers to a card issued by "IDT Financial Services Limited ("IDT")".

1. PERSONAL USE OF DATA

The TIBBAA Smartcard BV, "hereinafter referred to as TS" discloses how TS collects data, shares it with the option given to the buyer in terms of the data used and collected.

Tibbaa Smartcard is a product of Tibbaa Smartcard BV, which is a card provided by IDT Financial Services Limited ("IDT"), the issuer of the card ("card and/or smartcard") and its privacy terms and conditions are located at the following link <http://www.idtfinance.com/privacypolicy.pdf>. Further the terms and conditions of Tibbaa Smartcard, (Effective date May 2018).

TS reserves the right to change the terms and conditions as required and also for purposes of compliance with the GDPR directive, therefore please keep checking for updates as they are done. This TS privacy policy applies to the all applicable *products and services*, including all the apps of TS which enables use of TS all over Europe and general TS privacy conditions also applies which is on the web site.



2. TS INFORMATION COLLECTED AND USED

All identified personal information to identify the person and their biographic information, including anonymous and general information associated with a specific person is collected. TS's use, operation and transaction collects your name, address, e-mail addresses, birthdate, social media information provided, card id information and not limited to all pertaining card information.

The reason this information is required to be stored and collected by TS is for purposes of the integrity of the card transaction and also to have up to date information on the Buyers/Purchasers users personalized card and also to ensure that there is no unauthorized fraudulent activity. Further this data information collected is disclosed for compliance with law if there is a subpoena, court order with respect to a disputed card transaction and related legal processes. Also, the card information will be dispensed with respect to following TS obligations regarding know your customer, anti-money laundering laws and its related checks and balances required by law. Explanation can also be found on the FAQ on the TS web site as well. The information will also be disclosed regarding safety of the person and any possible violation of law and complying with the enforcement authorities.

When we contact you we will record the conversation for better customer and quality service and only for purposes of TS breach of the user, purchaser, buyer and fraudulent activity or for purposes of legal compliance based on a complaint or otherwise and to cooperate with enforcement authorities.

3. INFORMATION ACCESSED BY TS FROM THIRD PARTIES

As a purchaser/ buyer when you buy the card and use card related services and products, we obtain your personal data as described above and also to run other credit and security authentication measures to prevent any unauthorized activity as well. Further, TS collects anonymous information from companies that have access to customer data, demographic, purchasing habits, gender age, spending patterns, leisure activities and related travel information. TS will deploy Artificial Intelligence (AI) tools to ensure security of the card and TS platform and services. TS. will also contact you if you specifically authorize TS to contact you regarding card and other products and you will also have the option to be placed on do not call list as well.

4. INFORMATION COLLECTED ON WEBSITES

Information entered on the TS web site and accessed through the POS terminal system and other TS related products, the following information is collected, browsing history, all purchaser information related to the card transaction, IP address – web addresses, Cookies according to the Cookie policy, Web Beacons and other related technologies, including information related to basic TS Customer/ Purchaser/ Buyer information.



5. INFORMATION OF PROMOTIONAL OFFERS ON TS

Your information related to TS, what we collect is primarily your name, email, contact information, card id, additional promotional offers, sweep stakes entry for prizes if any, are all based on your information provided by you voluntarily and you have the option to opt out in your personal TS account.

If you agree to participate in the surveys or how to make any products more efficient to your needs or customer/buyer/purchaser's feedback, you agree that we will be contacted in relation to the general service or a grievance complaint filed by you. Also, if you agree to subscribe to TS email or SMS messages regarding links with email or text messages, then you specifically authorize TS to contact and if you do not want to be contacted you can submit a request in writing to DPO@tibbaa.com (Data Protection Officer)

The following information is shared by TS in relation to TS product with TIBBAA group of companies, which utilizes information with sharing of companies regarding TS products and services, including the TS product for general, operational and security reasons. This leads to access and sharing of information on TS services, back end systems, POS systems and all systems through which the card operates. We further ensure that data is protected outside of the European Economic Area and personal information in relation to TS and as described is treated in accordance with the terms and conditions of this agreement.

6. INFORMATION SHARED REGARDING TS OUTSIDE OF TIBBAA SMARTCARD B.V.

Tibbaa Smartcard B.V. will not share your personal data with third parties, except to: Payment Service Providers as necessary to complete the integrity of transaction as mentioned below and through other required payment processors.

As described below and in the following limited circumstances. These third parties are limited by law or by contract from using the information for secondary purposes other than for which the information is shared and authorized by the Buyer.

TS is entitled to share your personal information with Financial institutions required for processing your payment.

Information may only be used as described in the General Terms and Conditions of TS, which form part of the agreement between us pursuant to your acceptance of the same part of your registration with us. In addition, TS. will only share your personal data in accordance with applicable Dutch law. This includes disclosures on the following basis: (a) we may disclose your personal information to appropriate third parties, who we believe in good faith are investigating fraud or other illegal activity, or to conduct investigations into violations of our Terms & Conditions. This occurs in situations, including but not limited to, for the purposes of criminal proceedings, investigations by (credit/debit) card companies or the police for payment fraud to prevent terrorism or for the enforcement of intellectual property rights. (b) we may provide information in response to a (court summons, warrant, court order, levy, restraining order of a court-appointed curator or other comparable legal processes as required by law, including any summons from private parties in a civil case. (c) we may disclose information to your agent or legal representative



(such as the holder of a power of attorney that you granted or a guardian appointed to you). (d) we may share aggregated (but not individual) statistical data with our business partners or for public relations purposes (for example publication that a percentage of our Merchants (customers) makes use of a certain payment methods). (e) as with any other business, it is possible that Tibbaa Smartcard B.V. could merge with or be acquired by another company in the future. If such an acquisition occurs, subject to applicable law, the successor company would have access to the information maintained by TS, including personal secured data, but the acquiring company will continue to be bound by this Privacy Policy. (f) we may share your information with our parent company, subsidiaries and joint ventures for the coordination of the services we provide and for training purposes as well, to enforce our terms and conditions and promote confidence, safety, integrity and security. (g) to offer our Merchants (customers) our service, we may share your transaction status information and transaction identifiers with the Merchants you pay. (in case of for example a chargeback). We do not share bank details or card id information. (h) to offer our service to our Merchants we share your personally identifiable information with our Merchants. Both the required information and the additional information is not shared with bank details and card id information and not even under circumstances when the bank account information and card id information is redacted TS will contact you with your personal information and send messages to you in cases where there is a change in status of Purchase Rights, confirming the opening of your TS Account, reporting the status of the payment, or a payment error or matter dealing with payment fraud or unauthorized fraudulent activity.

7. INFORMATION ACCESSED BY THE THIRD PARTY ENTITIES, INCLUDING SOCIAL MEDIA NETWORK

Information is collected through third party web sites, advertisements but none of them have access to the card data and related customer card information. Such information is general information regarding advertisement of products and services of TS. Third party access, widgets and stores all form of cookies have access to general information and not any specific information on TS products with Buyer/Purchaser information.

8. OPTING OUT OF EMAIL TEXT AND MARKETING MESSAGES, ONLINE ADVERTISING

Buyer and Purchasers have an option to opt out or partially have part of the information removed as desired with respect to the TS product and such correspondence with specific information should be removed with e-mail in writing to DPO@tibbaa.com (Data Protection Officer)

The (online) adds will have an unsubscribe link and text message will have an option for the buyer/purchasers and prospective customers of TS products to unsubscribe from the advertisement as well.

Marketing correspondence will only be sent to children above the age 16 and online access to a TS account is only possible once the user confirms the age to be above 16 years with close supervision and monitoring from parents, guardians and other legal representatives as well. So if a minor is allowed to use the card,



then the parents, guardians and other legal representatives should be aware that personal information will be stored for that specific purpose and for accessing the card.

No TS card will be utilized for any illegal activity for any violation of law, which is a prerequisite for possession and access to the card. TS product network will never be used for transfer of card information and will only be authorized by secured persons of TS for TS products and ensures the highest level of encryption needed (SSL encryption protection as well).

9. SECURITY AND STORAGE DURATION OF PERSONAL DATA, DATAPORTABILITY

For purposes of brevity of convenience and clarity, the Data is kept for the time necessary to provide the card services requested as described for the purposes of the terms and conditions. All data not related to regulatory obligations and or by law will be kept 2 years after the last contact. You as a User can always request that the Data Controller suspend or remove that data, if permitted by the rules and regulations, fraud detection, anti-money laundry and/or applicable law or compelling reason(s) by TS, suspension and/or removal in 2 weeks after receipt of such request. TS will inform you about these compelling reason(s).

You have the right to obtain in a machine readable format, if technical possible the extract of all your information stored by TS. You can exercise this right by making a request to the DPO@Tibbaa.com (Data Protection Officer). This enables you to “port” your data.

You can also exercise the right to correct any personal data, please inform the DPO@Tibbaa.com in such a case and what needs to be changed. Our DPO department will help you further.

You can view, export, change (limited by security rules) in the TS account your settings and personal info. TS has the right however to stop or limit service(s) when changes need further investigation because of security or fraud, anti-money laundry or other compelling reasons by TS. TS will inform you about these compelling reason(s).

TS high level of security and protecting your personal data will be maintained at all times and has our highest priority in our day to day business. No process is, however 100 percent secure at all times. If you are aware of the security breach, please contact us with specific facts at DPO@tibbaa.com Attention: Data Protection Officer.

This policy is subject to change as required by law and regulatory changes, Netherlands, Dutch law applies.