

#### **Privacy Notice**

This privacy notice will inform you pursuant to Article 13 and 14 of European Regulation no. 2016/679 (hereinafter referred to as the "**Regulation**") concerning the protection the personal data of yours (hereinafter "**Personal Data**"), how we collect, use, and protect your personal data and tell you about your rights and how the law protects you.

The company Nexi Central Europe a.s., registered office at Röntgenova 1, PO Box 79, Bratislava, (hereinafter, "**Company**", "**we**" and "**our**"), as the data controller, undertakes to protect the privacy and security of your data is of the utmost importance.

We have implemented policies and procedures to ensure that we take all appropriate steps to protect your data in what we do.

## Category of data we collect about you

Transaction personal data including Cardholder Data, where appropriate, relating to a specific Transaction which is necessary to Process in connection with the Provision of the ATM Services and/or the Scheme Licence Services. Recording of phone call when reaching us via ATM Help Desk.

#### How is your personal data collected?

In relation to transaction data at the moment when transaction is initiated by Cardholder via ATM including:

- balance enquiry: when a Cardholder requests information in relation to the balance of their account;
- decline: the declining of a Transaction, by the Issuer, for whatever reason;
- rejection: the rejection of a Transaction by the Issuer for whatever reason;
- reversal: the full or partial reversal of a Transaction after it has been completed;
- PIN change: where a Cardholder uses an ATM to change, or request to change, the personal identification number of their Card;
- withdrawal: an activity which results in the dispensing of cash (including a transaction which has been performed via DCC, where applicable);

In relation to recording directly from data subject when reaching us via ATM Help Desk.

## Purpose and legal basis of the processing

Purpose	Legal basis
<ul> <li>Managemant of processing services necessary to process a Transaction, maintain and store Transaction and card data and to provide settlement and reconciliation information in relation to Transactions</li> <li>Enable to introduce transactions into one or more Card Schemes for cardholders</li> <li>Necessary to Process in connection with the Provision of the ATM Services and/or the Scheme Licence Services.</li> <li>Recording call for quality monitoring purposes when reaching ATM Help Desk.</li> <li>The data is also processed to obtain anonymous statistical information on the use of the service, to monitor its correct functioning. Phone calls may also be recorded to manage critical customer requests within the scope of the ATM services (e.g. retained cards management), for the purposes of improving the service and for the management of any complaints made by customers. In this case, the legal basis of the processing is legitimate interest.</li> </ul>	<ul> <li>Performance of contractual obligation (Article 6 (1) b) GDPR</li> <li>Legitimate interests (Article 6 (1) f) GDPR</li> </ul>

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# nexi

#### Whom we share your personal data with

Transactional data are visible to Card Schemes, your data on card are visible to our contracted partners when collecting by ATM retained cards.

## How long we use your personal data

Recording for quality monitoring purposes are stored for a period of 5 years.

Transaction personal data including Cardholder Data necessary to Process ATM Services and/or the Scheme Licence Services are stored for a period of 10 years.

# Transfer of personal data to third country /international organization

As we are providing ATM services outside of EU countries, your personal data may be processed abroad, outside the European Union.

Any transfer to countries outside the European Union or outside European Economic Area can take place only if the conditions set out in Articles 44 of GDPR and followed are fulfilled.

Whenever we transfer your Personal Data out of EEA, we ensure it is protected by using one of the following safeguards:

- Ensuring data is transferred only to a country that has laws that protect your personal data in the same way as it would be in EEA
- Using a contract approved by the European Commission (called Model Clauses)

#### Automated decision-making including profiling.

We do not provide automated decision-making including profiling.

## **Data Controller**

Nexi Central Europe a.s., with registered office in Bratislava, Röntgenova 1, PO Box 79.

**Data Protection Officer** (DPO) of the Company can be contacted via email at the address: CE\_DPO@nexigroup.com or on address of the companywith specifying "to hands of Data Protection Officer" at envelope.

## **Privacy Rights**

You have the right to access, rectify or delete the data stored by the Company that concerns you, as well as the right to object to, or limit certain types of processing (including the right to revoke consent to the processing previously granted), as well as to be sent the personal data concerning you in a structured, commonly used format readable using an automatic device (right to data portability). Finally, you have the right to lodge a complaint with a competent Supervisory Authority. Individual Rights Requests should be referred to following email address: CE\_DPO@nexigroup.com.