



Bancontact
Company

BANCONTACT
PRIVACY POLICY

MARCH 2016

TABLE OF CONTENTS

1. INTRODUCTION – PURPOSE OF THIS PRIVACY POLICY

2. DEFINITIONS

3. OVERVIEW

4. PERSONAL DATA PROCESSED BY BANCONTACT COMPANY FOR PURPOSES DETERMINED

5. PERSONAL DATA COLLECTED AND PROCESSED BY BANCONTACT COMPANY FOR PURPOSES DETERMINED BY BANCONTACT COMPANY (AS DATA CONTROLLER)

5.1. Governance of the Payment Scheme	14
5.2. Added-value services not directly performed for Members' activities under the Payment Scheme	15
5.3. Promotion and analytics of Bancontact Company branded products and services, as well as direct marketing	15
5.4. Operations conducted on Bancontact Company's Website(s)	16
5.4.1. General	16
5.4.2. Cookies	16

6. DATA PROCESSING IN RELATION TO THE BANCONTACT APP

6.1. General	21
6.2. Analytics in the Bancontact app – consent to the storing of and gaining access to information in the Bancontact App Users's mobile device	22

7. DISCLOSURE AND TRANSFERS OF PERSONAL DATA

8. SECURITY OF PERSONAL DATA



9. EXTERNAL LINKS

10. HOW BANCONTACT COMPANY MAY UPDATE THIS PRIVACY POLICY

11. NEW PURPOSES

12. DATA SUBJECT'S RIGHTS

13. OPTING-OUT OF E-MAILS, SMS, MMS, AND OTHER COMMUNICATIONS

14. HOW TO CONTACT US



Bancontact
Company

1.

INTRODUCTION – PURPOSE OF THIS PRIVACY POLICY



This Privacy Policy describes the roles and responsibilities of Bancontact Company, as well as, incidentally, of Members of the Payment Scheme, with regard to the Processing of Personal Data that Bancontact Company either processes on behalf and for the purposes of Members of the Payment Scheme, as Data Processor, or that Bancontact Company collects and processes for purposes defined by Bancontact Company, as Data Controller.

This Privacy Policy describes the role and Processing of Personal Data by Bancontact Company, firstly as Data Processor, and secondly as Data Controller, including the types of Personal Data collected and processed, the purposes of the Processing, with whom Personal Data may be shared and the choices the Data Subject can make about the use of his Personal Data by Bancontact Company. It also describes the measures taken to protect the security of Personal Data and how Data Subjects can contact Bancontact Company to exercise their rights of access, rectification and objection.

This Privacy Policy is in addition to, and does not in any circumstances replace the privacy policies of the Members of the Payment Scheme acting as Data Controllers for what they are concerned.

Personal Data protection is very important to Bancontact Company. Bancontact Company respects your privacy and will ensure that Personal Data are Processed in accordance with the applicable laws, in particular the Data Protection Laws (as defined below).



Bancontact
Company

2.

DEFINITIONS

- **"Bancontact App"** means the Bancontact mobile solution distributed by Bancontact Company for authenticating Mobile Payment Transactions;
- **"Bancontact App User"** means every person (you), who installed the Bancontact App on his mobile device;
- **"Bancontact Card"** means a Bancontact branded card linked to a payment account;
- **"Bancontact Company"** ("**we**", "**our**" or "**us**") means Bancontact-MisterCash NV/SA, whose registered office is at 1040 Brussels, Rue d'Arlon - Aarlenstraat 82, registered with the Crossroads Bank of Enterprises under number 0884.499.250 RPR/RPM Brussels;
- **"Cardholder"** means the holder of a Bancontact Card;
- **"Certificate Holder"** is a third party services provider that is certified and authorized to provide products or services to Members in the framework of the operation of the Payment Scheme;
- **"Data Controller"** means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Data;
- **"Data Processor"** means a natural or legal person, public authority, agency or any other body that Processes Personal Data on behalf of the Data Controller;
- **"Data Protection Act"** means the Act of 8 December 1992 on the protection of privacy with regard to the processing of personal data, as amended;
- **"Data Protection Laws"** mean any and all applicable data protection laws and regulations, as amended from time to time, including the Data Protection Act and its implementing decrees;
- **"Data Subject"** ("**you**" or "**yours**") means an identified or identifiable person to whom specific Personal Data relates; he/she is someone who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity; in the framework of the Payment Scheme, Data Subjects generally include individual Cardholders or Merchants, acting as payers or payees, as well as Bancontact App Users, who have a contractual relationship with Members, as well as employees of Members;
- **"Member"** means a legal entity, either a card issuer, an acquirer or funds collector, that has entered into a Payment Scheme Membership Agreement with Bancontact Company to be admitted to operate and process safe payment transactions between payers and payees (e.g. Cardholders and Merchants) and carry out other activities under the Payment Scheme;
- **"Merchant"** means a natural person who or a legal entity that offers the Cardholders the possibility to make payments for the purchase of goods and services offered by them;
- **"Mobile Payment Transaction"** means a Bancontact transaction, authenticated through the Bancontact App, of transferring funds, irrespective of any underlying obligations between the Payer

and the Payee. This can be a P2P Mobile Payment Transaction or a P2M Mobile Payment Transaction;

- **"P2M Mobile Payment Transaction"** means a Mobile Payment Transaction where the Payee is a Merchant;
- **"P2P Mobile Payment Transaction"** means a Mobile Payment Transactions where the Payee is a Bancontact App User (excluding Merchants);
- **"Payee"** means a person (including Merchants) wishing to receive payments by means of a Mobile Payment Transaction;
- **"Payer"** means a Bancontact App User wishing to make payments by means of a Mobile Payment Transaction;
- **"Payment Scheme"** means all components of the Bancontact Company payment network allowing Members to operate safe payment transactions in a SEPA compliant manner, between acquirers and Merchants, on the one hand, and issuers and Cardholders, on the other hand ;
- **"Personal Data"** means any information relating to an identified or identifiable natural person;
- **"Privacy Policy"** means the current privacy policy;
- **"Process"** or **"Processing"** means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction;
- **"Sub-Processor"** means any processor engaged by a Data Processor who agrees to receive Personal Data exclusively intended for the Processing activities to be carried out on behalf of a Data Controller in accordance with such Data Controller's instructions and the terms of a written contract for Sub-processing;
- **"Website"** means www.bancontact.com.



Bancontact
Company

3.

OVERVIEW



Bancontact Company may Process Personal Data in the two following capacities in relation to the Payment Scheme, as further detailed below:

- Bancontact Company may Process Personal Data in the framework of the Payment Scheme for purposes and activities set out by the Members (see Section **Error! Reference source not found.** of this Privacy Policy), which include managing the switch and providing other Processing services ; for the purpose of those activities and services, Bancontact Company only Processes Personal Data on behalf and under the instructions of Members, as a Data Processor; and
- Bancontact Company may Process Personal Data for purposes that are defined by Bancontact Company itself, including for (i) the governance of the Payment Scheme and administration of the various parties thereto (in particular contact persons and employees of Members of - and other parties to - the Payment Scheme) (see Section · of this Privacy Policy), (ii) the provision of certain value-added services not directly related to Members' purposes and activities under the Payment Scheme (see Section 5.2 of this Privacy Policy); (iii) the provision, improvement and promotion of Bancontact Company brand and products and services and public relations (see Section 5.3 of this Privacy Policy), including through its Website (see Section 5.4 of this Privacy Policy) and analytics in the Bancontact App (see Section **Error! Reference source not found.** of this Privacy Policy); and (iv) the distribution and the operation of the Bancontact App (see Section 7.1 of this Privacy Policy); in all those cases where Bancontact Company decides on the means and purposes of the underlying data Processing, Bancontact Company acts as a Data Controller.



Bancontact
Company

4.

**PERSONAL DATA PROCESSED
BY BANCONTACT COMPANY
FOR PURPOSES DETERMINED**



Members of the Payment Scheme determine the purposes (e.g., to allow payment transactions to be carried out between Payers and Payees in a SEPA compliant way and to allow Mobile Payment Transactions) and the essential means of the Processing of Personal Data in the framework of and for the purposes of their respective activities under the Payment Scheme.

Members are the Data Controllers of such Personal Data, and are therefore responsible for compliance with applicable data protection law requirements in respect of such Personal Data. Please refer to the Members' (e.g., your bank's) applicable privacy policies for further information as to the processing of your Personal Data by Members under the Payment Scheme.

In the framework and for the purpose of Members' activities under the Payment Scheme, including the execution of Mobile Payment Transactions (whether authenticated through the Bancontact App or not), Bancontact Company provides certain services to its Members (notably switching, clearing and settlement services), which include the Processing of individual Cardholders', Merchants' or App Users' (for the purpose of executing Mobile Payment Transactions) Personal Data on behalf and under the instructions of Members. Bancontact Company does not determine the purposes or means for which such Cardholders', Merchants' or App Users' Personal Data are Processed under the Payment Scheme and for the purpose of executing Mobile Payment Transactions, but only acts under the instruction of Members.

As Data Processor, Bancontact Company has contractually agreed vis-à-vis the Members to Process such Personal Data only upon their instructions, and to implement appropriate security measures to protect the security and confidentiality of such Personal Data.



Bancontact
Company

5.

PERSONAL DATA COLLECTED
AND PROCESSED BY
BANCONTACT COMPANY FOR
PURPOSES DETERMINED BY
BANCONTACT COMPANY (AS DATA
CONTROLLER)



Bancontact Company may also process, for purposes determined by Bancontact Company, Personal Data collected directly from the Data Subjects or that Bancontact Company receives from Members in the framework of the Payment Scheme. In those cases, Bancontact Company acts as Data Controller. Such purposes determined by Bancontact Company include:

- to ensure proper governance of the Payment Scheme and to administer the certification of Certificate Holders (see Section • below);
- to provide certain added-value services to Members (see Section 5.2 below);
- to promote, analyze and develop Bancontact Company brand, products and services, including direct marketing activities (see Section 5.3 below);
- to operate Bancontact Company's Website and the various activities offered thereon (see Section 5.4 below);
- to distribute and operate the Bancontact App (see Section 7.1 below); and
- to understand how the Bancontact App is used and how it can be improved (see Section **Error! Reference source not found.** below).

5.1. Governance of the Payment Scheme

Bancontact Company processes Personal Data for the governance of the Payment Scheme, such as the eligibility, admission and ongoing management of Members to the Payment Scheme, the decision-making process within the Payment Scheme, invoicing of Members, maintaining Members' and Certificate Holders' directories, compliance with the Payment Scheme Membership Agreements, dispute management, compliance with legal obligations as well as to respond to lawful information requests from competent government authorities or law enforcement authorities. This includes, in particular, the processing of Personal Data (including names, contact details, function, position, title, etc) relating to representatives, contact persons and employees of Members.

Bancontact Company also processes Personal Data for the certification and administration of Certificate Holders in the Payment Scheme, in particular the Processing of Personal Data (such as names, contact details, function, position, title, etc.) relating to representatives, contact persons and employees of Certificate Holders.



5.2. Added-value services not directly performed for Members' activities under the Payment Scheme

Bancontact Company may offer added-value services that are not directly related to the services carried out on behalf of Members, such as statistics, analytics and reporting regarding payment transactions processed within the Payment Scheme.

Notably, Bancontact Company performs business reporting services on payment transactions processed through the switch and provides an optional service allowing the calculation of the interchange and service fees for the transactions processed through the switch to be received or to be paid by each Member.

In connection with those services, Bancontact Company extracts and processes certain information relating to payment transactions processed through the switch for the above statistics, analytics and reporting purposes as defined by Bancontact Company. For such purposes, Bancontact Company does, however, only access non personally identifiable information, i.e. only information relating to transactions not containing Payers' or Payees' (Cardholders', Merchants' or App Users') identity.

5.3. Promotion and analytics of Bancontact Company branded products and services, as well as direct marketing

As a rule, Bancontact Company does not collect directly, nor does Bancontact Company have any direct contact with individual Cardholders (other than Bancontact App Users) or Merchants whose Personal Data are Processed under the Payment Scheme, and that are controlled by the respective Members.

Bancontact Company may, however, collect and process Personal Data (such as names, address, phone number, e-mail address, bank name, habits, etc., for example through online forms or paper forms), from time to time, for the promotion of Bancontact Company branded products and services, to improve the same as well as for public relations and direct marketing, such as for example, sending newsletters, invitations to events, inquiries and satisfaction surveys, responding to enquiries, or compiling reports as to the use of the Bancontact Company branded products and services, notably through Bancontact Company's Website. Where required by law, Bancontact Company shall collect the Data Subject's consent prior to using its Personal Data for direct marketing purposes, and will provide the Data Subject with the possibility to opt-out, at any time and free of charge, on any promotional communications send to Data Subjects.



The collection and processing of Personal Data on Bancontact Company's Website is described under Section 5.4 below.

Lastly, Bancontact Company may also use analytics to understand the use of the Bancontact App by Bancontact App Users, and improve the same, as described under Section **Error! Reference source not found.** below.

5.4. Operations conducted on Bancontact Company's Website(s)

5.4.1. GENERAL

Bancontact Company may collect and process Personal Data about Data Subjects when they access and use Bancontact Company's Website.

By accessing and using such Website, you declare having read this Privacy Policy and this Section, as set out below, and you agree to the terms thereof.

When using Bancontact Company's Website, Data Subjects may provide us with their Personal Data (such as name, address, phone number and email address) when registering for Bancontact Company's newsletter on its Website, or when contacting Bancontact Company through an online contact form, as described under Section 5.3 above.

In addition, Bancontact Company also collects certain information by automated means, using technologies such as cookies, web server logs and web beacons for security and functional purposes and for the provision of third party services, as further described below, with the Data Subjects' prior consent where required by applicable law.

Bancontact Company also collects data on the use of the Website, such as the number and duration of visits or used browser, but Bancontact Company is not able to identify you with such data.

5.4.2. COOKIES

When visiting Bancontact Company's Website, with your prior consent where required by applicable law, your computer device will automatically receive cookies that are transferred from Bancontact Company's Website to your Internet browser. Once you have accepted the use of cookies on the Website, whether expressly or by your conduct, your preferences with regard to the use of cookies will be saved in the form of a cookie for your future visits to the Website for as long as you do not remove the cookies stored on your



computer. If you disable the cookies that we use, parts of Bancontact Company's Website may not work properly.

What are cookies?

Cookies are small files or pieces of information that may be stored on your computer device.

Bancontact Company's Website uses two types of cookies, "session cookies" and "persistent cookies". Session cookies are automatically deleted at the end of your browsing session. Persistent cookies remain longer on your device, for the duration of each specific cookie, and will be automatically deleted at the end of their "lifetime".

For what purposes does Bancontact Company use cookies?

Bancontact Company uses cookies for security and functional purposes, as detailed in the table below.

Cookie	Purpose of the cookie	Duration of the cookie
Cookie accepted	The Website uses cookies remembering your preferences with regard to the use of cookies on the Website(s), more in particular whether you have been informed on the use of cookies on the Website and have accepted the use of such cookies by clicking "Continue" or any other link on the relevant website page. Bancontact Company will only use the information generated by these cookies for functional purposes, excluding any direct marketing purposes.	Persistent
Technically required cookies	The Website also uses cookies that are necessary for the transmission of communication on the Website or that are necessary to provide or register a service specifically requested by you.	



Do we use third party cookies?

Bancontact Company also uses a number of suppliers that may also set cookies on your computer device on our behalf when you visit the Website(s) to allow them to deliver the services they are providing, as detailed in the table below.

If you would like to learn more about these cookies, as well as information as to how to reject such cookies, please see their respective privacy policies:

Cookie	Purpose of the cookie	Duration of the cookie
Slideshare	<p>The Website contains Slideshare slideshows. These do not set cookies automatically, but a number of cookies may be placed on your computer when you play the slideshows. Slideshare will use the information generated to remember user settings when viewing the slideshows embedded in our Website. This cookie does not identify you personally unless you are logged into Slideshare, in which case it is linked to your Slideshare and/or Facebook account.</p> <p>Further information and how to reject this cookie: http://www.slideshare.net/privacy</p>	Persistent
Youtube	<p>The Website contains Youtube videos. These videos do not set cookies automatically, but a number of cookies may be placed on your computer when you play the videos. Youtube will use the information generated to track visitor views and to remember user settings when viewing videos embedded in our Website. This cookie does not identify you personally unless you are logged into Google, in which case it is linked to your Google account.</p> <p>Further information and how to reject this cookie: http://www.google.co.uk/intl/en/policies/privacy/</p>	Persistent

Cookie	Purpose of the cookie	Duration of the cookie
Google Analytics	<p>Google Analytics is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to compile anonymous, aggregated statistics. Google will use the information generated by the cookie for the purpose of evaluating use of the Website, compiling anonymous, aggregated reports on website activity for website operators and providing other services relating to website activity and internet usage. Google will not associate IP addresses with any other data held by Google. Google will transfer and store the information generated on the basis of the cookie (including IP-addresses) to servers in the United States. Google and its subsidiaries are self-certified under the Safe-Harbor program.</p> <p>Further information and how to reject this cookie: http://www.google.com/intl/en/analytics/privacyoverview.html</p>	Persistent
Captcha (Google)	<p>These cookies are used by Google to generate CAPTCHA images to help protect the Website from "spambots". Without these cookies we would not be able to complete the registration process.</p>	Session

How can you control, delete or withdraw your consent to the use of cookies?

If you wish to withdraw your consent, to the extent the latter is required, to our use of cookies, or if you wish to delete or control the placing of cookies on your computer, you can change your browser settings to block or delete cookies. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings at:

- Internet Explorer: <http://windows.microsoft.com/en-US/windows-vista/How-to-manage-cookies-in-Internet-Explorer-9>
- Chrome: <http://support.google.com/chrome/bin/answer.py?hl=en-GB&hlrm=nl&answer=95647>
- Firefox: <http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences?s=cookies&r=5&as=s>
- Safari: <http://support.apple.com/kb/PH5042>

If you disable any of the cookies use by the Website, this may impact your experience while on the Website and some parts of it may not work properly.



Bancontact
Company

6.

**DATA PROCESSING IN
RELATION TO THE
BANCONTACT APP**

6.1. General

De Bancontact-app wordt rechtstreeks door Bancontact Company verdeeld aan de Bancontact-app Gebruikers.

Wanneer Bancontact-app Gebruikers de Bancontact-app downloaden, activeren en gebruiken, zullen ze bepaalde informatie verstrekken aan Bancontact Company (zoals de naam van de Bancontact-app Gebruiker, zijn Bancontact Kaartnummer, vervaldatum en PIN code). Daarnaast kan bepaalde informatie automatisch verzameld worden, zoals gegevens betreffende het mobiel toestel waaronder een voetafdruk van het mobiel toestel en andere technische informatie, het nummer van het mobiel toestel, mobiele applicaties op het mobiel toestel, naam van het toestel, e-mail adres geïnstalleerd op het mobiel toestel, identificator, OS versie, naam telecom operator, telefoonnummer, SIM kaart nummer, EMEI, IMSI, etc.

Bancontact Company verzamelt en Verwerkt de bovenvermelde Persoonsgegevens van de Bancontact-app Gebruiker, als Verantwoordelijke voor de Verwerking, voor de doeleinden van i) de Bancontact-app ter beschikking te stellen van de Bancontact-app Gebruiker, hierbij inbegrepen het downloaden, installeren, registreren, gebruiken en toegang verkrijgen tot de Bancontact-app, (ii) de Bancontact-app operationeel te beheren, hierbij inbegrepen het aanbieden van diensten via de Bancontact-app (waarbij wordt opgemerkt dat de Kaartuitgever de Verantwoordelijke voor de Verwerking van persoonsgegevens blijft, die worden verwerkt met het oog op het uitvoeren van Mobiele Betalingstransacties en dat Bancontact Company in dat opzicht enkel handelt als Verwerker in naam en op instructie van de Kaartuitgever), en klachten te behandelen met betrekking tot de Bancontact-app, (iii) de toegang tot de Bancontact-app te blokkeren, de diensten van de Bancontact-app te schorsen of te onderbreken voor veiligheidsdoeleinden, (iv) verdere updates van de Bancontact-app beschikbaar te maken voor Bancontact-app Gebruikers, (v) analyse en rapportering in verband met het gebruik van de Bancontact-app en Mobiele Betalingstransacties geauthenticeerd via de Bancontact-app uit te voeren, alsook (vi) voor doeleinden van direct marketing en marktonderzoek.

Het verzamelen en Verwerken van Persoonsgegevens in de Bancontact-app wordt beschreven in de specifieke gebruiksvoorwaarden en het privacy reglement dat van toepassing is op de Bancontact-app, en beschikbaar is in de App Store/Google Play en in de Bancontact-app.



6.2. Analytics in the Bancontact app – consent to the storing of and gaining access to information in the Bancontact App Users’s mobile device

Bancontact Company may, however, decide to embed analytics tools in the Bancontact App whereby - subject to the Bancontact App User's consent where required by law - third party analytics providers (such as Google Analytics) will be allowed to collect information regarding the use of the Bancontact App and the Bancontact App User's device to provide aggregated reports in anonymous form to Bancontact Company. Bancontact Company will not receive neither process any personally-identifiable information about the Bancontact App User, but only aggregated and anonymized reports in order to understand how the Bancontact App is used and how it can be improved.

By downloading, installing and using the Bancontact App, the Bancontact App User consents to Bancontact Company making use of third parties analytics tools in the Bancontact App, in particular Google Analytics, as well as to the Processing of his/her Personal Data as described in Section 7.1 above. Google Analytics is a web analysis service provided by Google, Inc. ("Google"). Google Analytics uses anonymous identifiers (random string of characters that is used for the same purposes as a cookie on platforms, including certain mobile devices, where cookie technology is not available) to track and analyze how users use the Bancontact App. The information generated by the Bancontact App about the use of the Bancontact App by the Bancontact App User (including language, regional information (country, territory, city), device and network information (brand, model, service provider, operating system) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of measuring users' interaction with the Bancontact App, evaluating the use of the Bancontact App, and compiling reports on Bancontact App activity. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Bancontact Company shall use anonymous and aggregated reports from Google Analytics for the sole purpose of evaluating use of and improving the Bancontact App. The Bancontact App User can object or withdraw his/her consent to the use of Google Analytics by cancelling installation or uninstalling the Bancontact App from his/her mobile device.



Bancontact
Company

7.

DISCLOSURE AND TRANSFERS OF PERSONAL DATA



Except as otherwise stated in this Privacy Policy, Bancontact Company will not disclose nor transfer any Data Subject's Personal Data to third parties unless the Data Subjects have been provided with an opportunity to consent to such disclosure where required by law.

Bancontact Company may, however, disclose Data Subjects' Personal Data to third party service providers acting on Bancontact Company's behalf (where Bancontact Company acts as Data Controller) or for its account (where Bancontact Company acts as Data Processor). Bancontact Company requires such third party service providers to Process Personal Data only as instructed by Bancontact Company or, where Bancontact Company acts as Data Processor, by the relevant Data Controller(s) and to implement appropriate technical and organizational measures to protect the security and confidentiality of Personal Data.

Bancontact Company further reserves the right to disclose Data Subjects' Personal Data to respond to authorized information requests from government authorities or law enforcement authorities, or when otherwise required by law.

For the purposes above, Bancontact Company may transfer Data Subjects' Personal Data to countries others than the country in which it was originally collected, it being noted that your Personal Data will however only be transferred within the European Economic Area or countries recognized by the EU Commission as adducing an adequate level of protection of personal data. When Bancontact Company transfers Data Subjects' Personal Data to other countries, it will protect that information as described in this Privacy Policy.



Bancontact
Company

8.

SECURITY OF PERSONAL DATA



The security of Personal Data is important to Bancontact Company. As Data Processor of Personal Data processed on behalf of Members, as well as Data Controller of Personal Data collected and processed for purposes determined by Bancontact Company, Bancontact Company implements appropriate technical and organizational security measures to protect the security and confidentiality of such Personal Data.

Bancontact Company has taken internal and organizational measures to prevent Personal Data from being accessible to and processed by unauthorized parties and maintains physical, electronic, and procedural safeguards to secure Personal Data.

As Bancontact Company deems appropriate, Bancontact Company uses security measures consistent with industry standards, such as identifier and password requirements, to protect Personal Data.

Bancontact Company endeavors to protect the privacy and confidentiality of Personal Data through appropriate security measures, however, Bancontact Company cannot always guarantee the complete security of data processing, for instance in case of data processing through Internet or other electronic communication platforms.



Bancontact
Company

9.

EXTERNAL LINKS



Bancontact Company's Website or services may contain hyperlinks to third parties' websites or information for your convenience or information. These websites or information operate independently from Bancontact Company. Bancontact Company has no control over and is not responsible for the privacy practices or the content of any of such websites or information of third parties to which we provide links from our Website or services. You should check the applicable privacy policy of the website when linking to other websites.



Bancontact
Company

10.

HOW BANCONTACT COMPANY MAY UPDATE THIS PRIVACY POLICY



This Privacy Policy may be updated from time to time to reflect change in Bancontact Company Processing practices. Bancontact Company will notify any significant change by posting a prominent announcement on its Website and/or in the Bancontact App and shall indicate at the top of the Privacy Policy the date when it was most recently updated. Data Subjects will be bound by changes to the Privacy Policy when using the Website and/or the Bancontact App after such changes have been notified as described herein.



Bancontact
Company

11.

NEW PURPOSES



Bancontact Company may use your Personal Data for purposes not initially set forth in this Privacy Policy, but Bancontact Company will inform you of such new purposes in accordance with Section 11 above and, where required by law, will allow you to consent to such new purposes.



Bancontact
Company

12.

DATA SUBJECT'S RIGHTS



You have the right to request access to your Personal Data held and controlled by Bancontact Company as Data Controller as described under Section **Error! Reference source not found.** above, to request the rectification thereof, as well as to object, at any time and for free, to the processing of your Personal Data by Bancontact Company for direct marketing purposes. You may exercise your rights by following the procedures described under Sections 14 and 15 below.



Bancontact
Company

13.

OPTING-OUT OF E-MAILS, SMS, MMS, AND OTHER COMMUNICATIONS



You may opt-out from receiving promotional material by email, SMS, MMS or any other communication means from Bancontact Company, at any time and for free, by following the instructions provided to you in those communications or by contacting Bancontact Company as described under Section 14 below.



Bancontact
Company

14.

HOW TO CONTACT US



If you have any questions or concerns about this Privacy Policy, or if you would like to exercise your rights of access, rectification, or to object to the processing of your Personal Data for direct marketing purposes, you may do so by contacting Bancontact Company by e-mail at info@bc-mc.eu or at the following address:

Bancontact-MisterCash nv/sa
Aarlenstraat - Rue d'Arlon 82
1040 Brusdsels - Belgium

Where Bancontact Company only processes your Personal Data on behalf of its Members, as Data Processor, you should contact the relevant Member (e.g., the bank issuing your Bancontact Card if you are an individual Cardholder, or your acquirer if you are an individual Merchant), that controls your Personal Data, to exercise your rights of access, rectification and objection in accordance with the relevant Member's privacy policy.