



## Privacy Policy

March 2023

This policy explains what you can expect from us and what we need from you in relation to your personal data. Please read this carefully as this policy is legally binding when you use our Services. In case of any doubts please refer to our [Terms and Conditions](#).

For the purpose of the relevant data protection regulations, the company in charge of your information (as known as the data controller) is **CLARICO PAY LTD**, located at **49 Mowlem Street, First Floor – Unit 10, E2 9HE, London, United Kingdom**. Our registration number with the Information Commissioner's Office UK is ZA064539. If you have any questions about how we protect or use your data, please email us at [info@claricopay.com](mailto:info@claricopay.com).

### 1. How we protect your personal information

1.1 We are serious about guarding the security of your personal information and use a secure server to store your personal information. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using Transport Layer Security technology (T.L.S. 1.2). Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share this password with anyone else and not to use this password for other services or products.

1.2 As you will know, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data we cannot guarantee the security of your data during transmission, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

1.3 We restrict access of your personal information to those employees of **CLARICO PAY** who have a business reason for knowing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information. We maintain physical, electronic and procedural safeguards that comply with the relevant laws and regulations to protect your personal information from unauthorised access.

1.4 In some instances in order for us to provide our Services to you, we may need to share your information with our branches or Group Companies outside of the EEA. If you have more questions about this sharing of information, please email [info@claricopay.com](mailto:info@claricopay.com).

### 2. Information we may collect from you

We may collect and use the following data about you:

2.1 Information you give us.

(a) You may give us information about you by filling in forms when registering or using our Services or via correspondence e.g. email. This includes information you provide when you

register to use our Services, participate in discussion boards or other social media functions on our Website or App, enter a competition, promotion or survey, and when you report a problem with our Services. The information you give us may include your name, address, e-mail address, phone number, financial information (including credit card, debit card, or bank account information), payment reason, geographical location, social security number, personal description and photograph.

(b) We may also need additional commercial and/or identification information from your e.g. if you send or receive certain high-value or high volume transactions or as needed to comply with our anti-money laundering obligations under applicable law.

(c) In providing the personal data of any individual (other than yourself) to us during your use of our Services, you promise that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.

2.2 Information we collect about you. With regard to your use of our Services we may automatically collect the following information:

(a) Details of the transactions you carry out when using our Services, including geographic location from which the transaction originates;

(b) Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

(c) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time); products you viewed or searched for; 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 and any phone number used to call our Customer Support number.

2.3 Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties and may receive information about you from them for example, banks and payment service providers you use to transfer money to us; banks and payment service providers of your recipient; business partners; sub-contractors in technical, payment and delivery services; advertising networks; analytics providers; search information providers; and credit reference agencies.

2.4 Information from social media networks. If you log in to our Services using your social media account (for example, Facebook or Google) we will receive relevant information that is necessary to enable our Services and authenticate you. The social media network will provide us with access to certain information that you have provided to them, including your name, profile image and e-mail address. We use such information, together with any other information you directly provide to us when registering or using our Services, to create your account and to communicate

with you about the information, products and services that you request from us. You may also be able to specifically request that we have access to the contacts in your social media account so that you can send a referral link to your family and friends. We will use, disclose and store all of this information in accordance with this privacy policy.

### **3. Cookies**

3.1 Our Services use cookies to distinguish you from other users. This helps us to provide you with a good experience and also allows us to improve our Services. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

### **4. Uses made of the information**

We use your information in the following ways:

- (a) to carry out our obligations relating to you contracts with us and to provide you with the information, products and services that you request from us;
- (b) to comply with any applicable legal and/or regulatory requirements;
- (c) to notify you about changes to our Services;
- (d) as part of our efforts to keep our Services safe and secure;
- (e) to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (f) to improve our Services and to ensure that they are presented in the most effective manner;
- (g) to measure or understand the effectiveness of advertising we serve and to deliver relevant advertising to you;
- (h) to allow you to participate in interactive features of our Services, when you choose to do so;
- (i) to provide you with information about other similar goods and services we offer;
- (j) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you; or
- (k) to combine information we receive from other sources with the information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **5. Disclosure of your information**

5.1 We may share your information with selected third parties including:

- (a) affiliates, business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- (b) advertisers and advertising networks solely to select and serve relevant adverts to you and others; and
- (c) analytics and search engine providers that assist us in the improvement and optimisation of our site.

5.2 We may disclose your personal information to third parties:

- (d) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- (e) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Customer Agreement and other applicable agreements; or to protect the rights, property, or safety of **CLARICO PAY**, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- (f) to assist us in conducting or co-operating in investigations of fraud or other illegal activity where we believe it is reasonable and appropriate to do so;
- (g) to prevent and detect fraud or crime;
- (h) in response to a subpoena, warrant, court order, or as otherwise required by law;
- (i) to assess financial and insurance risks;
- (j) to recover debt or in relation to your insolvency; and
- (k) to develop customer relationships, services and systems.

## 6. Where we store your personal data

6.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who works for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your payment order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## 7. Your rights

7.1 You have the right to ask us not to process your personal data for marketing purposes by contacting us at [info@claricopay.com](mailto:info@claricopay.com).

7.2 Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility for them. Please check these policies before you submit any personal data to these websites.

## 8. Access to information

8.1 Subject to applicable laws, you may have the right to access information we held about you. Your right of access can be exercised in accordance with the relevant data protection legislation. Any access request may be subject to a fee of to meet our costs in providing you with details of the information we hold about you.

## 9. Removal of your details

9.1 According to the United Kingdom legislation, financial institutions are required to maintain customer's records for the minimum period of 5 years. In case you wish to delete your details

with us, please send your request in writing via email to [info@claricopay.com](mailto:info@claricopay.com) 5 years after your last transaction, or 5 years after you completed your registration in case your account was open but hasn't been fully activated.

## **10. Changes to our privacy policy**

10.1 Any changes we may apply to our privacy policy will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **11. Contact**

11.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@claricopay.com](mailto:info@claricopay.com).

11.2 If you feel that we have not addressed your questions or concerns adequately, you may submit a complaint to the Information Commissioner's Office in the United Kingdom. You can find their details accessing <https://ico.org.uk/global/contact-us/>.