

## OUR CO-BRANDED PRIVACY POLICY

WE ARE COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY.

We will always keep your personal data safe and private; and never sell your personal data.

### 1. About us

We are The Reputation Exchange Plc. We are an authorised Distributor of the Co-branded **RANGERS F.C. Official Visa Debit Card**. We are a company incorporated in England & Wales with company number 09977505 and having its registered address at Suite 2a1, Northside House, Mount Pleasant, Barnet, Hertfordshire, England, EN4 9EB.

### 2. Why do I need to read this policy?

We will collect your personal data when you use:

- the dedicated Co-branded website.
- the dedicated Co-branded app; or
- any of the services you can get access to through the Co-branded app or website.

When we say, 'personal data', we mean information which can be used to personally identify you (for example, a combination of your name and postal address).

This policy explains important information about the data we collect, how we use it, and your rights if you want to change how we use your personal data. If you have concerns about how we use your personal data, you can contact our data privacy manager at [privacy@therepx.com](mailto:privacy@therepx.com)

### 3. What personal data do you collect about me?

We collect different types of Personal Data from you. The information below explains what personal data we collect and use.

#### We collect information you provide when you:

- fill in any forms; correspond with us;
- register to use the Co-branded app or website;
- open an account or use any of our services;
- take part in online discussions, surveys or promotions;
- speak with a member of our customer support team (either on the phone, email or through the dedicated Co-branded app or website);
- enter a competition; or
- contact us for other reasons.

#### We will collect the following information:

- your name, address, and date of birth;
- your email address and phone number;
- your Co-branded account details, password and other registration information;
- details of your bank account, including the account number, sort code and IBAN;

- details of your Co-branded Debit Card (and other debit or credit cards you have registered with us), including the card number, expiry date and CVC (the last three digits of the number on the back of the card);
- identification documents (for example, your passport or driving licence), copies of any documents you have provided for identification purposes, and any other information you provide to prove you are eligible to use our services;
- records of our discussions, if you contact us or we contact you (including records of phone calls);
- your image in photo or video form (where required as part of our Know-Your-Customer (KYC) checks or where you upload a photo to your Co-branded account).

### **Information from your device**

Whenever you use our Co-branded website or app, we collect the following information:

- Technical information, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, the browser type and version, the time-zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use.
- Information about your visit, including the links you have clicked on, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page.
- Information on transactions (for example, payments into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction (including merchants' and ATMs' locations), IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, details of device used to arrange the payment and the payment method used.

### **Information from others**

We collect personal data from third parties, KYC and fraud-prevention agencies and partners who help us to provide our services. This includes information to check your identity.

### **Information from publicly available sources**

We collect information and contact details from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches, and KYC purposes.

## **4. What is your legal basis for using my personal data?**

### **Keeping to our contracts and agreements with you:**

- We need certain personal data to provide our services and cannot provide them without this personal data.

### **Legal obligations**

- In some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

### **Legitimate interests**

- We sometimes collect and use your personal data, or share it with other organisations, because we have a legitimate reason to use it, and this is reasonable when balanced against your right to privacy. For example, we share documents that will personally identify you with KYC agencies to confirm you are who you say you are during registration. These documents are not shared for any other purpose.

## **5. How do you use my personal data?**

We use your personal data so we can provide the best service, tell you about products and services you may be interested in, and meet our legal obligations.

### **Providing Our Services**

Whenever you apply for a product or service, we will use your personal data to check your identity (as part of our KYC process) and decide whether to approve your application.

If you are already a Co-branded customer, we use your personal data to meet our obligations relating to any transactions you make (for example, making payments into and out of your Co-branded account, withdrawing cash or making payments with your Co-branded Debit Card).

We use your personal data to contact you by phone and provide you with information about our products or services, as well as customer support services. We may monitor or record any communications between you and us, including phone calls, to maintain appropriate records, check your instructions, analyse, assess, and improve our services, and for training and quality control purposes.

### **Marketing and providing new products and services that might interest you**

We use your personal data to do the following:

- provide you with information about other products and services we offer that are similar to those you have already used (or asked about, where allowed by law).
- provide you with information about our products or services which we think you might be interested in. To help us do this, we may use information about you to help us better understand your interests. You can opt out of this by emailing our Compliance Manager at [privacy@therepx.com](mailto:privacy@therepx.com).
- if you agree, provide you with information about our partners' promotions or offers which we think you might be interested in.
- if you agree, allow our partners and other organisations to provide you with information about their products or services.
- measure or understand the effectiveness of our marketing and advertising and provide relevant advertising to you.
- ask your opinion about our products or services.
- process applications for products and services available through us and make decisions about whether to approve applications.

### **Preparing anonymised statistical datasets**

We prepare anonymised statistical datasets about our customers' spending patterns for forecasting purposes etc. These datasets may be shared internally or externally with others, including authorised non REPX companies. We produce these reports using information about you and other customers. The information used and shared in this way is never personal data and you will never be identifiable from it. Anonymised statistical data cannot be linked back to you as an individual. Our legal basis is: legitimate interests (to conduct research and analysis, including to produce statistical research and reports); or legal obligations.

### **Meeting our legal obligations, enforcing our rights and other legal issues**

We may need to share personal data about you:

- with other organisations (for example, fraud-prevention agencies);
- if this is necessary to meet our legal obligations or in connection with legal claims;
- or to help detect or prevent crime.

## **6. Do you make automated decisions about me?**

Depending on the Co-branded products or services you use, we may make automated decisions about you. This means that we may use technology that can evaluate your personal circumstances and other factors to predict risks or outcomes. We do this for the efficient running of our services and to ensure decisions are fair, consistent, and based on the right information.

For example, we may make automated decisions about you that relate to:

- anti-money laundering and sanctions checks; and
- identity and address checks; and
- monitoring your account to detect fraud and financial crime.

Our legal basis is one or more of the following:

- keeping to contracts and agreements between you and us;
- or legal obligations.

## **7. How do you use my information for marketing?**

If you sign up to our services, and were allowed by law, we will assume you want us to contact you by post, email, and SMS text message with information about our Co-branded products, services, offers and promotions. We may use the personal data we have collected about you to tailor our offers to you. You can adjust your preferences or tell us you don't want to hear from us, at any time.

## **8. What are my rights?**

**The information below explains what rights you have and what those rights mean.**

You have the right to be told about how we use your personal data. We provide this privacy policy to explain how we use your personal data. If you ask, we will provide a copy of the personal data we hold about you. We can't give you any personal data about other people, personal data which is linked to an ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we've had with our legal

advisers. You can ask us to correct your personal data if you think it's wrong. You can have incomplete or inaccurate personal data corrected. Before we update your file, we may need to check the accuracy of the new personal data you have provided.

You can object to us processing other personal data (if we are using it for legitimate interests). If our legal basis for using your personal data is 'legitimate interests' and you disagree with us using it, you can object. However, if there is an overriding reason why we need to use your personal data, we will not accept your request. If you object to us using personal data which we need to provide our services, we may need to close your account as we won't be able to provide the services.

#### **You can ask us to transfer personal data to you**

If we can, and are allowed to do so under regulatory requirements, we will provide your personal data in a structured, commonly used, machine-readable format. You can withdraw your permission if you have given us any consent we need to use your personal data, you can withdraw your consent at any time by emailing [privacy@therepx.com](mailto:privacy@therepx.com) (Note, it will have been lawful for us to use the personal data up to the point you withdraw your permission).

#### **You can ask us to carry out a human review of an automated decision we make about you**

If we make an automated decision about you that significantly affects you, you can ask us to carry out a manual review of this decision. Your ability to exercise these rights will depend on several factors. Sometimes, we will not be able to agree to your request (for example, if we have a legitimate reason for not doing so or the right does not apply to the particular information, we hold about you).

## **9. How do I exercise my rights?**

To exercise any of your rights set out in the previous section, you can contact us by emailing [privacy@therepx.com](mailto:privacy@therepx.com). For security reasons, we can't deal with your request if we are not sure of your identity, so we may ask you for proof of your ID. We will usually not charge you a fee when you exercise your rights. However, we are allowed by law to charge a reasonable fee or refuse to act on your request if it is manifestly unfounded or excessive.

If you are unhappy with how we have handled your personal data, you can complain to your local data protection authority. In the United Kingdom, this is the ICO (<https://ico.org.uk/>).

## **10. Do you share my personal data with anyone else?**

We share your personal data both internally within REPX and externally with trusted 3<sup>rd</sup> parties to provide you with the best service. The information below explains which suppliers we normally share your personal data with and why.

#### **Suppliers who provide us with IT, payment and delivery services**

- To help us provide our services to you.

#### **Our banking and financial-services partners and payments networks**

- To help us provide our services to you. This includes banking partners, banking intermediaries and international payment-service providers.

#### **Card manufacturing, personalisation, and delivery companies**

- To create and deliver your personalised physical Co-branded Debit Card.

#### **Analytics providers and search information providers**

- To help us improve our website or app.

#### **Customer-service providers**

- To help us to provide our services to you and resolve any support queries you may have.

#### **Third Party Payers**

- We may share your name with third parties that pay money into your Co-branded account. This is necessary to confirm that the payment has been made to the correct account.

#### **For Legal Reasons**

We also share your personal data with fraud-prevention agencies to check your identity, protect against fraud, keep to anti-money laundering laws, and confirm that you are eligible to use our products and services.

We may also need to share your personal data with other third-party organisations:

- if we have to do so under any law or regulation;
- if we sell our business;
- in connection with criminal or fraud investigations;
- to enforce our rights (and those of customers or others);
- or in connection with legal claims.

## **11. Will my information go outside of the United Kingdom or Europe?**

As we provide an international service, we may need to transfer your personal data outside the United Kingdom or European Economic Area (EEA) for us to provide our services.

For example, if you ask to make an international payment, we will send funds to banks outside of the United Kingdom or EEA. We might also send your personal data outside of the United Kingdom or EEA to keep to global legal and regulatory requirements, and to provide ongoing support services.

We may share your personal data with credit-reference agencies and fraud-prevention agencies that are based outside of the United Kingdom or EEA. We will take all reasonable steps to make sure that your personal data is handled securely and in line with this privacy policy and data protection laws. If you would like more information, please email your questions to [privacy@therepx.com](mailto:privacy@therepx.com).

## **12. How do you protect my personal data?**

We recognise the importance of protecting and managing your personal data. Any personal data we process will be treated with the utmost care and security.

We use a variety of physical and technical measures to keep your personal data safe and prevent unauthorised access to or use or disclosure of it. Electronic data and databases are stored on secure computer systems with control over access to information using both physical and electronic means.

While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorised access, we cannot guarantee it will be secure during transmission by you to our app, a website, or other services. We use HTTPS (HTTP Secure), where the communication protocol is encrypted through Transport Layer Security for secure communication over networks, for all our app, web, and payment-processing services.

You are asked to create a password when you create a Co-branded account and asked to enter this whenever you login to your account. You will need to keep this confidential. Please do not share it with anyone

### **13. How long will you keep my personal data for?**

We will generally keep your personal data for six years after our business relationship with you ends or such period as may be required by applicable local laws.

We are required to keep your personal data for this long by anti-money laundering and e-money laws. We may keep your personal data for longer because of a potential or ongoing court claim or another legal reason.

### **14. How will you keep me updated on how you use my personal data?**

If we change the way we use your personal data, we will update this policy and, if appropriate, let you know by email or through our website.

### **15. Do you use cookies on your websites?**

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 about the cookies we use, please see our Cookie Policy on the website.