Privacy Notice for myPOS Campaigns and Promotional Events

Effective as of 25.05.2018

Last update: 06.02.2025

I. Why should you read this Privacy Notice?

myPOS is committed to the principles of personal data protection laid down in European and UK law and recognises the importance of safeguarding its customers' information. We are constantly improving our data processing activities and our privacy notices in order to provide you with as much transparency over the way we handle your data as we can. This Privacy Notice for myPOS Campaigns and Promotional Events describes how we collect, use, process, and disclose your information, including personal information, in relation to your participation in any myPOS Campaigns and Promotional Events.

If you have concerns about how we use your personal information, you can contact our data protection officer at dpo@mypos.com.

If you see an undefined term in this Privacy Notice, it has the same definition as in our Legal Agreement for myPOS Account, Legal Agreement for myPOS Card, Merchant Agreement, Privacy Policy or other legal documents regulating myPOS Service to all of which this Privacy Notice is inseparable part.

1.1. About us.

When this Notice mentions "we," "us," or "our," it refers to myPOS or an affiliate/partner of myPOS, which is responsible for your information under this Privacy Notice for myPOS Campaigns and Promotional Events. The specific responsible entity for your personal data may vary depending on the Campaign or Promotional Event and the country in which it takes places. The responsible entity in each case is referred to as the "**Data Controller**".

The responsible Data Controller is the organiser (or similar) of the Campaign or Promotional Event and may differ based on the country where the latter is carried out. Please refer to the terms and conditions for the particular Campaign or promotional event or the hyperlink above.

1.2. myPOS Campaigns and Promotional Events.

For the purposes of this Privacy Notice, myPOS Campaigns and Promotional Events means any activity, undertaken by myPOS, in order to popularise or otherwise promote our services, by organising and processing personal data of participants and/or visitors of any public event, campaign, competition, promotional event, seminar, webinar, show, expo, open day(s), referral program, survey, quiz, game, sweepstake, contest or similar activity hosted in offline or online.

myPOS Campaigns and Promotional Events are carried out for the purposes of promoting our business and services to other businesses, individuals and entities. In case you are participating for or on behalf of an entity we will treat you as an authorised person and you may be obliged to disclose to us personal data of the legal representatives, employees, agents, beneficial owners or any other third party related to the entity pursuant to the rules described below. You certify that where you have provided information regarding any third person beside yourself you have received prior consent from that other person to provide their personal information to us.

This Privacy Notice grants rights only to natural persons participating in a Campaign or Promotional Event. Whenever we use "you", "your", or similar terms, we are referring to the natural person participating in any capacity in the myPOS Campaign or Promotional Event. Those persons may be a representative, beneficial owner, authorised person or similar, or if the person is a sole trader.

II. How do we process your personal information?

We process your information in a secure, transparent, and lawful manner. Our processing activities are designed to protect your privacy while enabling us to provide and market services, enhance and improve customer experience, and fulfil our legal and regulatory obligations. The processing of your data includes:

Collection: We collect only the data necessary to market and deliver services, analyse and improve user experience, and ensure compliance with legal obligations and regulatory requirements.

Storage: Your information is stored securely, with measures in place to prevent unauthorised access, alteration, or disclosure.

Usage: We use your data for the purposes specified in Sections II and III of our Privacy Notice.

Sharing: Where necessary, we may share your information with trusted third-party processors, under strict data processing agreements. You can find more information about this in Sections II and III of this Privacy Notice.

Retention: We retain your data only as long as necessary to fulfil its purposes and as required by law. Please see Section VI for more details.

Deletion or Anonymisation: When your information is no longer needed, we securely delete or anonymise it to ensure your privacy. Please see Section VI for more details.

Where we are processing your data on the grounds of a statutory or contractual requirement (defined below as “our contract with you”, “compliance with legal obligations” and other similar), this means that you are obliged to provide the personal data (or allow us to collect it from third-parties) in order for us to be able to provide access/participation to any of our Campaigns and Promotional Events.

III. Information that we process in relation to our Campaigns and Promotional Events.

We may ask for, collect, process and share the following personal information when you register for, participate in, or otherwise interact with our Campaign or Promotional Event:

Type of personal data	Purpose of processing	Legal grounds under GDPR	What third-party processors can we use for this?

Names (first name, surname, last name)	Facilitating your participation in Campaigns or Promotional Events and maintaining our legal relationship	Our contract with you; Taking necessary steps prior to entering into a contract	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Evaluate registrations, applications and participation in Campaigns and Promotional Events, and compare information for accuracy, authentication and verification purposes	Our legitimate interests; Compliance with legal obligation	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Support outsourcing providers including our distributors; Database operators; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Facilitating login to platforms	Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; and In case there is any third-party processor, you will be provided with information about them in the contract or consent form
	Communication with you and provision of customer service	Our contract with you; Legitimate interest; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Customer service and support outsourcing providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Facilitating communication between you and other participants	Our legitimate interests; Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); and Other participants in Campaigns or Promotional Events
	Facilitating any transactions between you and us	Compliance with legal obligations; Our contract with you	Banks and payment providers; Auditors; Legal or other similar counsels; Accounting outsourcing providers; and Regulators and financial institutions
	Marketing, advertising and sharing of information related to products and services	Our legitimate interests; Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Marketing services providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Personalise, measure, and improve our advertising, marketing and your experience	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; and Other similar providers
	Profiling, performing analytics and conducting research	Our legitimate interest	Marketing, analysis and consultancy services providers
	Review and use of public comments and opinions made on social networking websites to better understand our customers and our facilitation and development of Campaigns and Promotional Events	Our legitimate interests	External organisers of Campaigns and Promotional Events (if applicable); Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; and Other similar providers
	Accept, process and administer online orders	Our contract with you	Our distribution network; outsourcing providers; and Our consultants
	Process purchase payments, issue invoices and or other kind of payment documents for the processed order	Our contract with you; Our legal obligations	Our distribution network; outsourcing providers; and Our consultants
	Organising delivery of orders and rewards	Our contract with you	Our distribution network; Suppliers or sellers of goods; Couriers; Outsourcing providers; and Our consultants
	Managing return procedure and refunds for defective orders and rewards	Our contract with you	Our distribution network; Suppliers or sellers of goods; Couriers; Outsourcing providers; and Our consultants
	Due diligence	Compliance with legal obligations	Our auditors; Legal or other similar counsels; Compliance outsourcing providers; and Regulators
	Risk and compliance analysis, security investigation and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; and Regulators
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	External organisers of Campaigns and Promotional Events (if applicable); Support outsourcing providers including our partners and distributors; Software outsourcing providers; Legal or other similar counsels; and Regulators
	Comply with any legal enforcement or authority request	Compliance with legal obligations	External organisers of Campaigns and Promotional Events (if applicable); and Your counterparties, bailiffs, courts, regulators, lawyers, insolvency practitioners, liquidators, debt collection agencies, arbitration tribunals and other similar persons that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you
	Protect and exercise our legal rights	Our legitimate interest Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); Legal or other similar counsels; Accounting outsourcing providers; Support outsourcing providers; Our auditors; Debt collection agencies; Competent courts; Arbitration tribunals; and Other similar third parties that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you

Date and place of birth	Facilitating your participation in Campaigns or Promotional Events and maintaining our legal relationship	Our contract with you; Taking necessary steps prior to entering into a contract	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Evaluate registrations, applications and participation in Campaigns and Promotional Events, and compare information for accuracy, authentication and verification purposes	Our legitimate interests; Compliant with legal obligation	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Support outsourcing providers including our distributors; Database operators; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Communication with you and provision of customer service	Our contract with you; Legitimate interest; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Customer service and support outsourcing providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Facilitating any transactions between you and us	Compliance with legal obligations; Our contract with you	Banks and payment providers; Auditors; Legal or other similar counsels; Accounting outsourcing providers; and Regulators and financial institutions
	Marketing, advertising and sharing of information related to products and services	Our legitimate interests; Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Marketing services providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Personalise, measure, and improve our advertising, marketing and your experience	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; and Other similar providers
	Profiling, performing analytics and conducting research	Our legitimate interest	Marketing, analysis and consultancy services providers
	Create an account connection between your account and a third-party account or platform	Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Other third-party platform operators; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Due diligence	Compliance with legal obligations	Our auditors; Legal or other similar counsels; Compliance outsourcing providers; and Regulators
	Risk and compliance analysis, security investigation and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; and Regulators
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	External organisers of Campaigns and Promotional Events (if applicable); Support outsourcing providers including our partners and distributors; Software outsourcing providers; Legal or other similar counsels; and Regulators
	Comply with any legal enforcement or authority request	Compliance with legal obligations	External organisers of Campaigns and Promotional Events (if applicable); and Your counterparties, bailiffs, courts, regulators, lawyers, insolvency practitioners, liquidators, debt collection agencies, arbitration tribunals and other similar persons that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you
	Protect and exercise our legal rights	Our legitimate interest Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); Legal or other similar counsels; Accounting outsourcing providers; Support outsourcing providers; Our auditors; Debt collection agencies; Competent courts; Arbitration tribunals; and Other similar third parties that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you

Phone number	Facilitating your participation in Campaigns or Promotional Events and maintaining our legal relationship	Our contract with you; Taking necessary steps prior to entering into a contract	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Evaluate registrations, applications and participation in Campaigns and Promotional Events, and compare information for accuracy, authentication and verification purposes	Our legitimate interests; Compliant with legal obligation	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Support outsourcing providers including our distributors; Database operators; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Facilitating login to platforms	Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; and In case there is any third-party processor, you will be provided with information about them in the contract or consent form
	Communication with you and provision of customer service	Our contract with you; Legitimate interest; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Customer service and support outsourcing providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Facilitating communication between you and other participants	Our legitimate interests; Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); and Other participants in Campaigns or Promotional Events
	Marketing, advertising and sharing of information related to products and services	Our legitimate interests; Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Marketing services providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Personalise, measure, and improve our advertising, marketing and your experience	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; and Other similar providers
	Profiling, performing analytics and conducting research	Our legitimate interest	Marketing, analysis and consultancy services providers
	Create an account connection between your account and a third-party account or platform, if applicable	Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Other third-party platform operators; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Accept, process and administer online orders	Our contract with you	Our distribution network; outsourcing providers; and Our consultants
	Organising delivery of orders and rewards	Our contract with you	Our distribution network; Suppliers or sellers of goods; Couriers; Outsourcing providers; and Our consultants
	Managing return procedure and refunds for defective orders and rewards	Our contract with you	Our distribution network; Suppliers or sellers of goods; Couriers; Outsourcing providers; and Our consultants
	Due diligence	Compliance with legal obligations	Our auditors; Legal or other similar counsels; Compliance outsourcing providers; and Regulators
	Risk and compliance analysis, security investigation and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; and Regulators
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	External organisers of Campaigns and Promotional Events (if applicable); Support outsourcing providers including our partners and distributors; Software outsourcing providers; Legal or other similar counsels; and Regulators
	Comply with any legal enforcement or authority request	Compliance with legal obligations	External organisers of Campaigns and Promotional Events (if applicable); and Your counterparties, bailiffs, courts, regulators, lawyers, insolvency practitioners, liquidators, debt collection agencies, arbitration tribunals and other similar persons that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you
	Protect and exercise our legal rights	Our legitimate interest Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); Legal or other similar counsels; Accounting outsourcing providers; Support outsourcing providers; Our auditors; Debt collection agencies; Competent courts; Arbitration tribunals; and Other similar third parties that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you

Nationality	Facilitating your participation in Campaigns or Promotional Events and maintaining our legal relationship	Our contract with you; Taking necessary steps prior to entering into a contract	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Evaluate registrations, applications and participation in Campaigns and Promotional Events, and compare information for accuracy, authentication and verification purposes	Our legitimate interests; Compliant with legal obligation	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Support outsourcing providers including our distributors; Database operators; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Communication with you and provision of customer service	Our contract with you; Legitimate interest; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Customer service and support outsourcing providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Facilitating communication between you and other participants	Our legitimate interests; Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); and Other participants in Campaigns or Promotional Events
	Marketing, advertising and sharing of information related to products and services	Our legitimate interests; Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Marketing services providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Personalise, measure, and improve our advertising, marketing and your experience	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; and Other similar providers
	Profiling, performing analytics and conducting research	Our legitimate interest	Marketing, analysis and consultancy services providers
	Create an account connection between your account and a third-party account or platform, if applicable	Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Other third-party platform operators; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Due diligence	Compliance with legal obligations	Our auditors; Legal or other similar counsels; Compliance outsourcing providers; and Regulators
	Risk and compliance analysis, security investigation and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; and Regulators
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	External organisers of Campaigns and Promotional Events (if applicable); Support outsourcing providers including our partners and distributors; Software outsourcing providers; Legal or other similar counsels; and Regulators
	Comply with any legal enforcement or authority request	Compliance with legal obligations	External organisers of Campaigns and Promotional Events (if applicable); and Your counterparties, bailiffs, courts, regulators, lawyers, insolvency practitioners, liquidators, debt collection agencies, arbitration tribunals and other similar persons that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you
	Protect and exercise our legal rights	Our legitimate interest Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); Legal or other similar counsels; Accounting outsourcing providers; Support outsourcing providers; Our auditors; Debt collection agencies; Competent courts; Arbitration tribunals; and Other similar third parties that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you

Email	Facilitating your participation in Campaigns or Promotional Events and maintaining our legal relationship	Our contract with you; Taking necessary steps prior to entering into a contract	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Evaluate registrations, applications and participation in Campaigns and Promotional Events, and compare information for accuracy, authentication and verification purposes	Our legitimate interests; Compliant with legal obligation	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; Support outsourcing providers including our distributors; Database operators; Accounting outsourcing providers; Our auditors; Legal or other similar counsels; Debt collection agencies; and Data aggregators
	Facilitating login to platforms	Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Software and platform service providers; and In case there is any third-party processor, you will be provided with information about them in the contract or consent form
	Communication with you and provision of customer service	Our contract with you; Legitimate interest; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Customer service and support outsourcing providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Facilitating communication between you and other participants	Our legitimate interests; Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); and Other participants in Campaigns or Promotional Events
	Marketing, advertising and sharing of information related to products and services	Our legitimate interests; Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Marketing services providers; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Personalise, measure, and improve our advertising, marketing and your experience	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; and Other similar providers
	Profiling, performing analytics and conducting research	Our legitimate interest	Marketing, analysis and consultancy services providers
	Create an account connection between your account and a third-party account or platform, if applicable	Our contract with you; Your consent	External organisers of Campaigns and Promotional Events (if applicable); Other third-party platform operators; and In case there is any other third-party processor, you will be provided with information about them in the contract or consent form
	Accept, process and administer online orders	Our contract with you	Our distribution network; outsourcing providers; and Our consultants
	Process purchase payments, issue invoices and or other kind of payment documents for the processed order	Our contract with you; Our legal obligations	Our distribution network; outsourcing providers; and Our consultants
	Organising delivery of orders and rewards	Our contract with you	Our distribution network; Suppliers or sellers of goods; Couriers; Outsourcing providers; and Our consultants
	Managing return procedure and refunds for defective orders and rewards	Our contract with you	Our distribution network; Suppliers or sellers of goods; Couriers; Outsourcing providers; and Our consultants
	Due diligence	Compliance with legal obligations	Our auditors; Legal or other similar counsels; Compliance outsourcing providers; and Regulators
	Risk and compliance analysis, security investigation and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; and Regulators
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	External organisers of Campaigns and Promotional Events (if applicable); Support outsourcing providers including our partners and distributors; Software outsourcing providers; Legal or other similar counsels; and Regulators
	Comply with any legal enforcement or authority request	Compliance with legal obligations	External organisers of Campaigns and Promotional Events (if applicable); and Your counterparties, bailiffs, courts, regulators, lawyers, insolvency practitioners, liquidators, debt collection agencies, arbitration tribunals and other similar persons that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you
	Protect and exercise our legal rights	Our legitimate interest Our contract with you	External organisers of Campaigns and Promotional Events (if applicable); Legal or other similar counsels; Accounting outsourcing providers; Support outsourcing providers; Our auditors; Debt collection agencies; Competent courts; Arbitration tribunals; and Other similar third parties that might have a claim or are servicing one against you, or have initiated a valid legal proceeding against you

IV. Specific data processing cases.

In any case, we may share any of your information for specific reasons, outlined below:

4.1. With other members of myPOS or iCard AD's corporate family: We may share your Personal Data with members of the myPOS or iCard Group of companies or within our extended family of companies that are related by common ownership or control, so that we may organise, manage and facilitate the Campaigns or Promotional Events for which you applied or in which you participated, or to manage the risk, or to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements.

4.2. With our partners and distributors: We may share information related to you or your company with our partners and distributors, if we are carrying out a joint Campaign or Promotional Event or if they are helping us organise, manage and facilitate a Campaigns or Promotional Events. In such cases, our partners and distributors may process some of your personal information.

4.3. Aggregated data: We may also share aggregated information (information about our users and participants in Campaigns and Promotional Events that we combine together so that it no longer identifies or references an individual user) and other anonymised information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

4.4. With our legal counsels for the purposes of exercising and protecting our legal rights: We may share any information which is necessary to allow us to exercise and protect our legal rights with our legal counsels or other relevant parties.

4.5. Business transfers: If any of the companies that organise, manage or facilitate Campaigns and Promotional Events, is involved in any merger, acquisition, reorganisation, sale of assets, transfer of portfolio, bankruptcy, or insolvency event, then we may sell, transfer or share some or all our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred to a different legal person and/or becomes subject to a different privacy notice.

V. Decisions based solely on automated processing.

Sometimes, our systems may take decisions based solely on automated processing. This does not mean that we will always use automated decision making for these processing activities. In case you believe that you have been unfairly treated by our automated decision-making systems you may, at any time, ask that a person reviews the decision by contacting us as described in the "How do I complain?" section. Such decisions may be done for processing activities that include:

Processing activity	Automated processing logic
Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking users and participants or by applying other fraud prevention measures.	Our fraud-prevention and monitoring systems may sometimes take automated decisions in regard to suspicious behaviour. For example, we may block a certain transaction or access to online service due to an attempt made in a remote part of the world just a few minutes after your last login from your home country.
Evaluation of metrics in relation to a Campaign or Promotional Event.	Our monitoring and analysis systems may sometimes take automated decisions in regard to evaluation of metrics related to Campaigns or Promotional Events. For example, the evaluation of the answers to multiple choice questions from a quiz may be reviewed and the result may be evaluated through an automated system.

VI. Information collected about you from third parties.

6.1. Third parties with whom we organise, manage or facilitate any Campaign or Promotional Event.

We may receive information from our partners, distributors and third-party service providers who are helping us in organising, managing or carrying out one or our or a joint Campaign or Promotional Event. In such cases, our partners and distributors may process some of your personal information.

VII. Data retention and erasure.

We generally retain your personal information for as long as is necessary for the performance of the Campaign or Promotional Event and to comply with our regulatory obligations. If you no longer want us to use your information for the purpose of facilitating your participation in any Campaign or Promotional Event, you can request that we erase your personal information. In such event, we shall dispose of the data, provided that it does not contain information which is significant due to

compliance, risk or regulatory reasons, that we are not obligated to keep the information by law. As a general rule, we usually keep information about your participation in Campaigns or Promotional Events for a period of 5 years.

Please note that if you request the erasure of your personal information:

We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention, enhancing security and other similar purposes.

We may also be obligated to retain personal data which we have collected for the purposes of complying with the relevant anti-money laundering and anti-terrorism financing for a certain period as defined under the applicable law;

We may retain and use your personal information to the extent necessary to comply with our legal obligations;

Because we maintain our records in a manner protecting from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time;

We reserve the right to retain your identification data for an indefinite duration if you have been placed on our company's internal blacklist due to suspected malicious, fraudulent, or analogous behaviour. This retention is predicated on our legitimate interest in preventing such individuals from accessing our services in the future.

VIII. Your rights.

You may exercise any of the rights described in this section by contacting the respective Data Controller via email. Please note that we may ask you to verify your identity before taking further action on your request. Please note that upon receipt of your email we shall try our best to provide you with the requested information and resolve your request in reasonable time, subject to all obligations which we or the related companies have under the applicable laws.

8.1. Managing your information.

You have the right to obtain the following:

- confirmation of whether, and where, we are processing your personal data;
- information about the purposes of the processing;
- information about the categories of data being processed;
- information about the categories of recipients with whom the data may be shared;
- information about the period for which the data will be stored (or the criteria used to determine that period);
- information about the existence of the rights to erasure, rectification, restriction of processing and objection to processing;
- information about the existence of the right to complain to any Regulator;
- where the data was not collected from you, information as to the source of the data;
- information about the existence of, and an explanation of the logic involved in, any automated processing;
- a copy of the personal data being processed.

8.2. Rectification of inaccurate or incomplete information.

You have the right to ask us to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself via access to your profile(s)).

8.3. Data access and portability.

You have the right to:

- receive a copy of your personal data in a structured, commonly used, machine-readable format that supports re-use;
- transfer your personal data from one controller to another;
- store your personal data for further personal use on a private device;
- have your personal data transmitted directly between controllers without hindrance.

8.4. Withdrawing consent and restriction of processing.

Where you have provided your consent to the processing of your personal information by us you may withdraw your consent at any time by contacting the relevant Data Controller via email and specifying which consent you are withdrawing. In case the Campaign or Promotional Event is carried our online and you have an Account you may withdraw your consent by updating the settings in your Account. Please note that the withdrawal of your consent does not affect the lawfulness of any processing

activities based on such consent before its withdrawal. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular if: (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

8.5. Objection to processing.

In some jurisdictions, applicable law may entitle you to require us not to process your personal information for certain specific purposes (including profiling for marketing purposes) where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing, or such processing is required for the establishment, exercise or defence of legal claims.

Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes by sending an email to the contact emails below.

8.6. Opting out.

You can ask us to stop sending you marketing messages at any time by contacting the relevant Data Controller.

Please bear in mind that irrespective of your opt-out, related to marketing messages, you will still continue to receive specific messages, which we are required to send you under the applicable legislation, insofar as you still have a legal relationship with us.

8.7. How do I complain?

Data Controller: If you wish to complain about anything related to the processing of your data, you should first try to resolve the matter by sending an email to the relevant Data Controller under this Privacy Notice from the email you used for the registration or participation in the Campaign or Promotional Event (see Appendix 1 for contact information of the relevant Data Controllers).

Supervisory Authority: In case you are not satisfied with the reply or resolution of the respective Data Controller, you have the right to lodge a complaint regarding its data processing activities with the competent data protection supervisory authority (see Appendix 1 for the details of the country-specific supervisory authorities).

IX. Operating globally.

To facilitate our global operations, we may be required to transfer, store, and process your information within our family of companies or with service providers based in Europe, India, Asia Pacific and North and South America. Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Notice. Where we transfer store and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

X. International transfers.

10.1. Adequacy decisions.

Where we disclose any of your collected personal information outside EEA, we shall comply with any relevant adequacy decision, where possible.

10.2. Other means to ensure an adequate level of data protection.

In case personal information is shared with corporate affiliates or third-party service providers outside the EEA in absence of an adequacy decision, we ensure that the necessary safeguards have been established prior to sharing your information, to maintain an adequate level of data protection. Further information about the safeguards is available upon request.

Protection of personal data transferred from or to the United Kingdom of Great Britain and Northern Ireland:

myPOS is a pan-European company, with operations both in the UK and EEA. Where we transfer any of your collected personal data from or to UK we shall comply with the Decision on the adequate protection of personal data by the United Kingdom -

General Data Protection Regulation, dated 28 June 2021.

XI. Security.

We take the responsibility to ensure that your personal information is secure, kept in an encrypted form on servers, collocated in special data centres in Class A jurisdictions in Europe. To prevent unauthorised access or disclosure of information we maintain physical, electronic and procedural safeguards that comply with applicable regulations to protect non-public personal information.

XII. Can children participate in our Campaigns and Promotional Events?

Our Campaigns and Promotional Events, unless explicitly stated in the Terms and Conditions, are not designed to individuals under the age of 18. We do not knowingly collect information, including personal data, from children or other individuals who are not legally able to participate in our Campaigns and Promotional Events. If we obtain actual knowledge that we have collected personal data from an individual under the age of 18, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from an individual under the age of 18.

XIII. Changes to this Privacy Notice.

We reserve the right to modify this Privacy Notice at any time in accordance with this provision. If we make changes to this Privacy Notice, we will post the revised Privacy Notice on our Campaigns and Promotional Events' page, the relevant platform, shop or premises. If you do not cease participation in the Campaign or Promotional Event before the date the revised version of the Privacy Notice becomes effective, your continued participation will be subject to the revised Privacy Notice.

XIV. Contact us.

If you have any questions or complaints about this Privacy Notice or our information handling practices, you may email us from the email you used for registration or participation in the Campaign or Promotional Event to the emails specified in **pt. 8.7. (How do I complain?)** above.

Appendix 1

Information about responsible Data Controllers and relevant Supervisory Authorities

Country:	Responsible Data Controller:	Data Controller's Contact information:	Supervisory Authority:
Austria	myPOS.AT GmbH	Data Protection Officer (DPO): dpo@mypos.com myPOS.AT GmbH, Karl-Popper-Street 6, 1100 Vienna, Austria (Karl-Popper-Straße 6, 1100 Wien, Österreich)	Austrian Data Protection Authority Barichgasse 40-42 1030 Vienna Email: dsb@dsb.gv.at Website: https://www.data-protection-authority.gv.at/
Belgium	myPOS Belgium BV	Data Protection Officer (DPO): dpo@mypos.com myPOS Belgium BV, Drukkerijstraat 16, 2000 Antwerpen, Belgium (Drukkerijstraat 16, 2000 Antwerpen, België)	Data Protection Authority - Gegevensbeschermingsautoriteit (APD-GBA) Rue de la Presse 35 - Drukpersstraat 35 1000 Bruxelles - Brussel Email: contact@apd-gba.be Website: https://www.autoriteprotectiondonnees.be/

Bulgaria	myPOS Services EOOD	Data Protection Officer (DPO): dpo@mypos.com myPOS Services EOOD, Business Park Varna - B6, r-n Mladost, 9009 Varna, Bulgaria (Бизнес Парк Варна - B6, р-н Младост, п.к. 9023, Варна, България)	Commission for Personal Data Protection 2, Prof. Tsvetan Lazarov blvd. 1592 Sofia Email: kzld@cpdp.bg Website: https://cpdp.bg/
	myPOS.BG EOOD	Data Protection Officer (DPO): dpo@mypos.com myPOS.BG EOOD, bul. James Boucher №76A, r-n Lozenets, 1407 Sofia, Bulgaria (бул. Джеймс Баучър № 76A, р-н Лозенец, п.к. 1407, гр. София, България)	
France	Payment Technology SARL	Data Protection Officer (DPO): dpo@mypos.bg Payment Technology SARL, rue Villaret de Joyeuse 2, Paris 75017, France	National Commission for Information Technology and Civil Liberties - CNIL 3 Place de Fontenoy TSA 80715 - 75334 Paris, Cedex 07 Website: https://www.cnil.fr/
Hungary	myPOS Hungary KFT	Data Protection Officer (DPO): dpo@mypos.com myPOS Hungary KFT, Balzac Street 37, 2nd floor, 1136 Budapest, Hungary (Balzac utca 37. mf 2. ajtó, 1136 Budapest, Hungary)	Hungarian National Authority for Data Protection and Freedom of Information Falk Miksa utca 9-11 H-1055 Budapest Tel. +36 1 3911 400 Email: privacy@naih.hu Website: https://www.naih.hu/
Ireland	myPOS Experience Center Limited	Data Protection Officer (DPO): dpo@mypos.com myPOS Experience Center Limited, 12 St. Stephen's Green, Dublin D02 WK11, Irland	Data Protection Commission 21 Fitzwilliam Square D02 RD28 Dublin 2 Email: info@dataprotection.ie Website: https://www.dataprotection.ie/
Italy	myPOS Italy S.R.L	Data Protection Officer (DPO): dpo@mypos.com myPOS Italy S.R.L, Corso Europa 11, 20122 Milan, Italy (Corso Europa 11, 20122 Milano, Italia)	Guarantor for the protection of personal data Piazza Venezia, 11 00187 Roma Email: segreteria.stanzione@gpdp.it Website: http://www.garanteprivacy.it/
Netherlands	myPOS Netherlands B.V.	Data Protection Officer (DPO): dpo@mypos.com myPOS Netherlands B.V., Tivolistraat 50, 5017HR Tilburg, Netherlands (Tivolistraat 50, 5017HR Tilburg, Nederland)	Dutch Data Protection Authority (DPA) Hoge Nieuwstraat 8 P.O. Box 93374 2509 AJ Den Haag/The Hague Website: https://autoriteitpersoonsgegevens.nl/

Portugal	myPOS Portugal - Payment Tecnologies, Unipessoal LDA	Data Protection Officer (DPO): dpo@mypos.com myPOS Portugal - Payment Tecnologies, Unipessoal LDA, Avenida Duque de Loulé Nº 12, 5th Floor 1050-090 Lisbon, Portugal (Avenida Duque de Loulé Nº 12, 5.º Andar 1050-090 Lisboa, Portugal)	National Data Protection Commission - CNPD Of. D. Carlos I, 134, 1º 1200-651 Lisbon Email: geral@cnpd.pt Website: http://www.cnpd.pt/
Romania	my POS Experience Center RO S.R.L.	Data Protection Officer (DPO): dpo@mypos.com my POS Experience Center RO S.R.L., Calea Floreasca, Nr. 55, parter, 14453 Bucharest Sector 1, Romania (Calea FLOREASCA, Nr. 55, parter, 14453 Bucureşti Sectorul 1, Romania)	The National Supervisory Authority for Personal Data Processing 28-30 Magheru Blvd. Sector 1 Bucharest Email: anspdcp@dataprotection.ro Website: http://www.dataprotection.ro/
Switzerland	myPOS Swiss AG	Data Protection Officer (DPO): dpo@mypos.com myPOS Swiss AG, Dufourstrasse 59, 8008 Zurich, Switzerland (Dufourstrasse 59, 8008 Zürich, Switzerland)	The Federal Data Protection and Information Commissioner (FDPIC) Feldeggweg 1 CH - 3003 Bern Website: https://www.edoeb.admin.ch/edoeb/en/home.html
United Kingdom	myPOS Partners Ltd	Data Protection Officer (DPO): dpo@mypos.com myPOS Partners Ltd, Dunne & Waterman Hamilton House, 1 Temple Avenue, London, England, EC4Y 0HA	The Information Commissioners Office Wycliffe House Water Lane Willmslow Cheshire SK9 5AF Email: casework@ico.org.uk Website: https://ico.org.uk/