Privacy policy for Manor World Mastercard® Cards

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Privacy policy for Manor World Mastercard® Cards

1. What is the purpose of this document?

This privacy policy explains how we handle personal data in connection with physical and/or virtual Manor World Mastercard® credit cards ("card/cards"). Contractual provisions on the legal relationship between us and a cardholder can be found in the General Terms and Conditions for Manor World Mastercard® Cards.

2. Who is responsible for the processing of your data?

Viseca Card Services SA, Hagenholzstrasse 56, 8050 Zurich ("Viseca" or "we") is responsible for the processing of your personal data (also referred to as "data") in connection with the issuance of the card.

Further information is available by telephone (+41 58 958 84 00), e-mail (privacy@viseca.ch) or post (Viseca Card Services SA, Data Protection, Hagenholzstrasse 56, 8050 Zurich).

3. How do we process your data?

3.1 What data do we process and for what purposes?

In connection with the card, we process the following data for the following purposes:

Card application:

The information provided in the card application is used to process the application. Also, for the purposes of combating money laundering and terrorist financing, we are required by law to process information from your identification documents and your credit data (e.g. profession). The same applies to the information required under the Swiss Consumer Credit Act for the purpose of checking the creditworthiness of the primary cardholder. Your data may be linked to data from other sources, such as data from authorities, public and private registers, such as the commercial register and debt enforcement register, databases and credit agencies (e.g. World Check, Teledata/CRIF, CreditReform, Zefix, tel.search.ch), the Centre for Credit Information (ZEK) and the Centre for Consumer Credit Information (IKO), partners outside the Aduno Group, other partners, employers, other Aduno Group companies, the media and the Internet.

Processing of the card contract, transactions:

When the card is used, we process the data that are provided to us or that we collect during the card relationship (e.g. change of the beneficial owner). In particular, we process information about your cards (e.g. card number and expiry date) and card transactions that is transmitted to us via global credit card networks (e.g. the card merchant, transaction amount, time and currency of the transaction and other data such as the type of card use or the number of incorrect PIN entries). In addition, we process data from the sources referenced in point 3.1 under "Card application". When the card is used for online transactions, additional information, such as your IP address, is processed. We process this data for the purpose of checking, authorising and processing the transactions and in connection with complaints and repayment claims. We may also receive information from the merchants in this process. If you have taken out insurance in connection with the card, data are also collected and processed in connection with the processing of insurance claims.

Risk and credit check (profiling):

We process your data, e.g. information about your income, to determine default, credit and other types of risk. In addition, we may process information about your payment history for credit check purposes.

Marketing:

We may use transaction data to build customer, consumer and preference profiles for marketing purposes, possibly in combination with data from other sources referenced in point 3.1 under "Card application". This allows us to assess the likelihood that you will be interested in specific services ("affinities"). We use information on transaction data, profiles and affinities to develop and improve products and services and to provide

you with individual advice, customised offers and information on products and services of Viseca, Aduno Group companies, other programme partners and third parties.

You further consent to Viseca sending guidance, offers and information on all kinds of products and services of Viseca, Aduno Group companies, programme partners and third parties via individual communication channels (e.g. post, e-mail, SMS and the "one" app).

You may object to the processing of your personal data for marketing purposes by notifying us at any time and you may withdraw your consent to any further processing of your personal data for marketing purposes. The foregoing does not apply to non-marketing messages or automatically generated invoicing texts.

Manor AG:

We process your data for the purposes of our collaboration with Manor AG ("Manor") and may consequently transmit certain data to Manor; see point 4 for further information. In addition, we may process data from Manor (including information on your non-card purchases from Manor) for data analyses, which we perform exclusively on behalf of Manor.

3.2 On what grounds do we process your data?

We process the data specified in point 3.1 based in particular on the following grounds:

 The processing is necessary for concluding, performing and enforcing the card contract. We process your data to review card applications and conclude and perform contracts. This also includes performing analyses of credit and fraud risk and creditworthiness, managing and developing customer relationships (including customer service, support and customer events) and customer communications.

- The processing is necessary for safeguarding our legitimate interests. We process your data to safeguard our legitimate interests and those of third parties. This relates in particular to the analysis of your behaviour and needs, e.g. through market studies and the creation of customer profiles for personalised marketing; direct marketing by us, other Aduno Group companies and other programme partners for our own and third-party services; the improvement and development of products and services and communication with our customers, including outside the card contract; compliance with statutory and internal regulations, risk assessment and the prevention and detection of criminal offences and misconduct; ensuring data security and internal administration, accounting and archiving; the performance of other corporate activities, such as the sale or acquisition of business segments, companies or parts thereof, including the transfer of personal data.
- The processing is necessary for complying with legal obligations and safeguarding rights. We process data in connection with our legal obligations, e.g. to combat money laundering and terrorist financing, to verify your creditworthiness, to retain certain data and to comply with our internal regulations. We may also process data to enforce and assert rights and claims, to avert claims, to combat abuse and to answer official enquiries.
- Consent: we process your data based on your consent granted by signing the card application.

4. Who processes and receives your data?

Within Viseca, individual employees and departments have access to your data to the extent necessary for the purposes described and for carrying out the tasks incumbent on the individual employees and departments in question. In addition, we may disclose your data to other Aduno Group companies who may use your data for their own purposes (such as advertising their own products and services). In addition, the following entities may also process your data:

Merchants, Mastercard®:

When your card is used, transaction data from the card merchants are transmitted to us via the global networks of the Mastercard® card organisation. We also transmit the card number and expiry date to Mastercard® when we issue or replace a Mastercard® card.

ZEK and IKO:

We are required to disclose credit information to the ZEK and the IKO. Particularly if the card is blocked or in the event of qualified payment default, fraudulent card use or similar incidents, we may notify the ZEK (and in certain cases also the law enforcement agencies).

Other programme partners:

We may forward information such as your name, address and affinities to other programme partners in accordance with point 3.1 under "Marketing". The programme partner may also collect affinity information about you when you redeem personalised vouchers with it. The programme partner may use this data for marketing purposes in accordance with its own privacy policy. In addition, we may notify Manor of the number of loyalty points generated using the card and of the termination of cards.

Transfer within the framework of participation in update services

International card organisations (Visa and Mastercard) require card issuers to offer update services (Visa Account Updater or Mastercard Automatic Billing Updater). These update services are used to automatically update the card details provided by the cardholder at participating retailers and service providers (hereinafter referred to as "acceptance points") to make payments (e.g. for online services, subscriptions or ticket apps), namely card number and expiry date, when they change. This ensures that, despite changes in card data, the acceptance points that support these update services can continue to process card payments smoothly as agreed with the cardholder.

For these update services, Viseca transmits the card number and card expiry date to the abovementioned international card organisations. For further processing of data transmitted to the international card organisations, we refer to the data protection regulations specific to the international card organisations (Visa and Mastercard)

Waiver: Each cardholder has the possibility of preventing the transfer within the framework of update services by (a) cancelling the card relationship before receiving a replacement card, (b) deleting the card data recorded at the retailer or cancelling the contractual relationship with retailers with whom cards are recorded or (c) by objecting to participation in update services via Viseca.

Service providers

In order to provide our services, we work with service providers in Switzerland and abroad (e.g. for card personalisation, IT services, consulting services, business information and collections). We may also engage additional programme partners to perform customer service tasks on our behalf and provide them with the data they need to perform such tasks (including transaction data).

Other entities:

If you have taken out insurance in connection with the card, we may transfer the data needed to process the insurance relationship to the insurer or third parties. We may also provide your data to authorities if this is legally required or in accordance with a legitimate interest. The primary cardholder has access to all primary and additional card data and may disclose such data to third parties. The additional cardholder only has access to his/her own data and can disclose such data to third parties without the involvement of the primary cardholder.

5. When do we transmit your data abroad?

The recipients of personal data mentioned in this privacy policy may be located abroad, including outside the EU or the European Economic Area ("third countries"). These third countries may not have laws in place that protect your personal data to the same extent as in Switzerland or the EU or EEA. In this case, we ensure data protection through data transfer agreements.

6. How long do we store your data?

We store your data for as long as this is necessary for the purpose for which it was collected. We also store personal data if we have a legitimate interest in retaining it, e.g. if we need the data in order to enforce or avert claims or guarantee IT security or if statutes of limitations are running. Finally, we store your data in order to comply with our statutory and regulatory obligations.

7. What rights do you have in connection with your data?

Provided the requirements of the applicable law have been met, you have the following rights:

- to request information on what personal data we have about you and how we process such data, and to request a copy of your personal data;
- to have your incorrect or incomplete personal data rectified:
- to have your personal data deleted;
- to have the processing of your data restricted;
- to file a complaint with a competent supervisory authority concerning the manner in which your personal data are processed; and
- to object to or revoke your consent to the processing of your personal data; even if you revoke your consent, we can continue to process your personal data to the extent we are legally required to do so.

8. What other rules apply?

Separate privacy policies apply to the following data processing operations:

- data processing by Manor under Manor's terms and conditions:
- use of the online services made available under the "one" digital service designation (www.viseca.ch/en/data-protection/one);
- data processing by Mastercard®: please note the terms and conditions of Mastercard®, particularly the global privacy notice of Mastercard® and your enforcement rights as a third-party beneficiary regarding the binding internal data protection regulations of Mastercard®.

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