



Privacy Notice

CFS-Zipp takes the protection of personal data very seriously, and we are committed to protecting your privacy rights. This privacy notice sets out the basis on which we collect and process your personal data.

In this notice, the words 'we', 'us' and 'our' refer to CFS-Zipp Limited. The word 'you' or 'your' refer to the individual user of our website (<http://cfszipp.com/>) or any services we may offer.

Who We Are

CFS-Zipp Limited is an Electronic Money Institution (EMI), authorised and regulated by the Financial Conduct Authority (FCA). We primarily adopt an Agency model, whereby selected EMI Agents provide electronic money (e-money) and payment service activities under our FCA e-money licence.

For matters relating to data protection, we are registered with the Information Commissioner's Office (ICO) as a data controller, our registration number is ZA014552. Our Agents act as data processors on our behalf when processing data relating to the e-money and payment services provided.

Collection of Personal Data

We collect, process and store personal data in order to fulfil our contractual obligation to you, and to conduct our business as an e-money and payment service provider. We also collect and process personal data as part of our regulatory and statutory obligations, imposed by the FCA, HMRC, ICO and the NCA, among others. All personal data we collect in relation to you is kept strictly secured.

The types of personal information we collect and process may include, but is not limited to the following: name, date of birth, address, tax identification number, passport number, internet protocol (IP) address, nationality and place of birth. The data we collect may come from the following:

- Information you give us when you apply to use any of our services, or a service obtained through one of our Agents, either by application form, online, telephone, email or post
- Correspondence you send to us or one of our Agents
- Visits to our website or use of online services, directly through us or via one of our Agents
- Processing financial transaction through us or one of our Agents
- Using the services provided by us or our Agents
- Conducting anti-money laundering checks

Use of Personal Data

We do not pass on, sell or swap any of your personal details with anyone unless we have a legal obligation to do so (for example, if required by the FCA or NCA). Nor do we use your personal data for marketing purposes. The information collected may be processed for the following purposes:



- Providing you with the product or service you applied for
- Corresponding with you on the product or service provided
- Prevention of financial crime. This can include sharing the information with law enforcement and regulatory bodies, such as the FCA and NCA
- Handling any enquires or requests you make
- Liaising with our Agents in order to provide the products or service you require, and to assist with the above

Storage and Access of Personal Data

All the personal data we collect is stored electronically on UK based servers. And where our Agent stores your personal data electronically, this will be on servers based with the EU. If personal data is ever stored in paper copy, this will be kept securely at our head office or the office of one of our Agents.

From time to time personal data may be accessed by a limited number of our back-office staff based outside of the EU. Data will continue to be stored on servers within the UK, but where this occurs we have, and will continue to, take steps to ensure all personal data is handled securely in accordance with this Privacy Notice and the relevant data protection laws (currently the General Data Protection Regulation).

Retention of Personal Data

We do not keep personal data for longer than necessary, taking in to account the products and services we provide, and the regulatory and reporting obligations we must abide by. In general, personal data will not be kept for longer than 6 years after our (or our Agents) relationship with you ends.

When your personal data is no longer required, we will securely delete and destroy it.

Cookies and IP Addresses

Cookies are generally used to help personalise your online experience, but you can adjust your browser settings to refuse cookies. However, we do not store, or enable the request to store, any data when you access or browse our website.

An IP Address is the unique network address of your computer. We do not store or capture IP Addresses when you access or browse our website. However, when completing e-money transactions via one of our Agents, IP Address information is captured so such transactions can be monitored in order to prevent money laundering and financial crime.

Your Rights

You have certain rights in relation to your personal data under current data protection laws, these are as follows:

- Right to be informed
- Right to access



- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision making including profiling

If you wish to exercise any of your rights, or would like further information, please contact us via the details provided below.

In regards to automated decision making, please note that we usually conduct electronic checks in relation to money laundering and due diligence, as we are legally required to do. But the final decision as to whether we enter in to a contract with you for the provision of e-money or payment services, will be taken by a human being.

Acceptance and changes to this Privacy Notice

By using our website and submitting personal data to us or one of our Agents, you acknowledge and accept the terms of this Privacy Notice.

This is the current Privacy Notice. It replaces any other Privacy Notice provided and any future changes will be updated on our website. And where appropriate, we will notify you by email or any other suitable communication.

Contact

If you have any queries or concerns about the use of your personal data, please direct these via email to dataprotection@cfszipp.com, or send a letter to our head office: 790 Uxbridge Road, Hayes, UB4 0RS, United Kingdom. In addition, you can contact us on 0208 561 4250.

You also have the right to complain to the data protection supervisory authority (the ICO). Further information can be found on their website at <https://ico.org.uk/>, or you can call them on 0303 123 1113.