

# PAYVER Limited – Privacy Policy

This privacy explains what we do with personal information when people visit our website, make contact with us or use our services.

The policy is intended to be layered, giving as much information as maybe required to allow readers to easily find what they are looking for. Clicking the various links will help navigate around the policy.

Part 1 of the policy are intended for everyone, with more specific information being provided in Parts 2 to 4 in respect of each differing activity. Whilst we encourage you read the entire policy, we realise you may prefer to read only that which concerns you most.

## [Part 1 – General Information](#)

## [Part 2 – Contacting us with a general enquiry](#)

## [Part 3 – Contacting us as part of an application to engage in a contract with us.](#)

## [Part 4 – Ongoing client account\(s\) management](#)

In each part, we will provide specify information to explain:

- what purpose we are processing it for (what we will use it for)
- why we are permitted to process your information (the lawful basis)
- whether you have to provide it to us (if it is optional or a condition of service)
- how long we store it for (retention schedule)
- if we will share it with others (other Controllers or Data Processors)
- if we will transfer it to another country
- if we will employ automated decision-making or profiling techniques
- if applicable, any restrictions to your data protection rights

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## Part 1 – General Information

### Who we are

PAYVER is the data controller for the personal information we process (unless stated otherwise).

We may be contacted by phone, email or surface mail using the following contact details:

Payver Limited  
New Court  
Abbey Road North,  
Shepley  
Huddersfield  
United Kingdom  
HD8 8BJ

Email to: [info@payver.eu](mailto:info@payver.eu)  
Phone: +44 (0) 20 3476 9011

### What is a Data Controller, Data Processor, Data Subject and Personal Information?

A Data Controller is an organisation that decides how and why to use the personal information of other people. To use personal information is to 'process' that personal information.

A Data Processor is an organisation that 'processes' personal information with a contractual obligation to a Data Controller to do so. A Data Processor does not have authority to decide how or why to use the personal information it has access to under such a contract.

A Data Subject is the living person that can be identified by the personal information.

Personal information is any information that can be used to identify a living person. For example names, email addresses, financial information, unique reference numbers and website usage. Exactly what may or may not be considered personal information may differ greatly from case to case.

### How do we get Personal Information?

Most of the personal information we will process is provided to us directly by the data subject for one of the following reasons:

- [Contacting us with a general enquiry.](#)
- [Contacting us as part of an application to engage in a contract with us.](#)
- [Ongoing client account\(s\) management](#)

We also receive personal information indirectly, in the following scenarios:

- Another person representing your organisation, may provide personal information about others within their organisation or group. This will be treated as part of an [application to engage in a contract](#) or [ongoing client account management](#).
- Where you have made personal information available on your organisation's website, or via an appropriate register, we may use such sources in our role as a regulated Small Electronic Money Institution. This will be treated as part of an [application to engage in a contract](#) or [ongoing client account management](#).

### Data Protection Rights

Under data protection law, users of our website and services have rights including:

**Right to be informed** - confirmation if we are or are not processing your personal information.

**Right of access** - to ask for copies of your personal information.

**Right to rectification** - to ask us to rectify personal information you consider may be inaccurate. This includes asking us to complete information you think is incomplete.

**Right to be forgotten** - to ask us to erase your personal information in certain circumstances.

**Right to restriction of processing** - to ask us to restrict the processing of your personal information in certain circumstances.

**Right to object** - to object to the processing of your personal information in certain circumstances.

**Right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

We will not charge a fee to exercise any of these rights and we will aim to fulfil any requests within one calendar month.

To exercise any of these rights, please contact us using the contact details provided at [Who we are](#).

### Your right to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details provided at [Who we are](#).

If you are unhappy with our response, or how we have used your data, you can also complain to the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights. The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

### Sharing your information

We will not share your information with any third parties for the purposes of direct marketing.

We use data processors who are third parties who provide services to and for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have contractually engaged them to do so. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information. For example under a court order or where we are required to cooperate with an appropriate supervisory or regulatory authority. In any scenario, we will only share such information that we and our legal advisors are satisfied we have a legal requirement to do so. In such circumstances, the receiving organisation will be considered a Controller in their own right.

### Links to other websites

Our website may contain links to other websites of interest. Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

### Regular review and updating of this privacy policy

We keep our privacy notice under regular review to make sure it is up to date and accurate.

Version 0.1 of this policy came into initial effect from 21st of September 2020.

This latest version, Version 2.0 came into effect from 13 April 2021.

PAYVER may change this policy from time to time by updating this page. Any revised Privacy Policy will be effective as of the publishing date. If changes are significant, we will notify existing clients and

those that have provided us with valid email addresses. We encourage you check this policy from time to time.

### **Children's personal information**

We do not provide services directly to children or proactively collect their personal information.

### **Visitors to our website**

When you visit our website, [payver.eu](https://payver.eu) or [payver.co.uk](https://payver.co.uk) we use a third-party service, provided by Google Analytics, to collect standard internet log information, generating a unique ID that is used to provide statistical data on how the visitor uses the website. This information is only processed in a way that does not directly identify anyone.

We do not make, nor do we authorise Google to make, any attempts to identify visitors to our website.

### **Cookies**

Google Analytics is facilitated by the use of cookies, for further information, please see our Cookie Policy.

### **Security and performance**

We use a third-party web application firewall from Amazon Web Services (AWS) to help maintain the security and performance of our website. The service checks that traffic to the site is behaving as would be expected. The service will block traffic that is not using the site as expected or that which appears to originate from an IP address in a country which is not approved to engage our services.

To provide this service, the system processes site visitors' IP addresses. We host our website in AWS in the EEA and keep traffic information for 12 months.

### **Purpose and lawful basis for website cookies, security and performance processing**

The purpose for the use of website cookies, security and performance processing is to maintain and monitor the performance of our website and to constantly look to improve the site and the services it offers to our users. The lawful basis we rely on in this case is Article 6(1)(f) which allows us to process personal data when it's necessary for our legitimate interests. For example in order to maintain the integrity of our IT systems and improve our website.

**Part 2 – Contacting us with a general enquiry.****What purpose we are processing it for (what we will use it for)**

Should you contact us with a general enquiry, we will use the information you provide to respond to your enquiry.

**Why we are permitted to process your information (the lawful basis)**

The lawful basis we rely on in this case is consent under article 6(1)(a) of the GDPR. Our record of consent is the overt act you made when you chose to contact us and provide your contact details. Your consent may be withdrawn at any time by contacting us using the contact details provided at [Who we are](#).

**Do you have to provide it to us (if it is optional or a condition of service)**

It is optional, but if you do not provide us with a means to respond to you, your enquiry cannot be fulfilled.

**How long do we store it for (retention schedule)**

We intend to store records of communications for no longer than 7 years. This may be extended if the enquiry proceeds to form pre contract communications. If the enquiry goes on to that stage, refer to [application to engage in a contract](#) or [ongoing client account management](#) for further information.

**Will we share it with others (other Controllers or Data Processors)**

Generally, we will not share it with another Controller.

We will share it with our data processor that conducts marketing and sales activities on our behalf.

**Will we transfer it to another country**

We will share it with our data processor that conduct marketing activities on our behalf, our data processor is based in the EEA, with a small number of sales representatives based outside the EEA.

For those representatives based outside the EEA, we have in place specific contracts approved by the European Commission which give personal data the same protection it has in Europe. If you are a client or prospective client, we will provide you with a copy of the clauses of these contracts upon request. To request a copy, please contact us using the contact details provided at [Who we are](#) and we will provide a copy by email.

**Will we employ automated decision-making or profiling techniques**

Yes, our systems use artificial intelligence to identify unintelligible email addresses. If your email address is input incorrectly, our systems will discard the enquiry. If you have not had a response within a few days, please consider contacting us via another method.

**Are there any restrictions to your data protection rights**

None that are anticipated.

### **Part 3 – Contacting us as part of an application to engage in a contract with us.**

#### **What purpose we are processing it for (what we will use it for)**

Should you make an application to engage in a contract with us, we will use the information you provide to establish if we may engage in a contract with you. This will involve some research with industry standard credit reference agencies or fraud prevention agencies and adding to the information you have provided to verify your identity and suitability.

#### **Why we are permitted to process your information (the lawful basis)**

The lawful basis we rely on in this case are:

- that it is necessary in order to take steps at the request of the data subject prior to entering into a contract with you under article 6(1)(b) of the GDPR, and
- subject to international Anti Money Laundering and Fraud Prevention laws, that it is necessary to comply with legal obligations to which we are subject under article 6(1)(c) of the GDPR

#### **Do you have to provide it to us (if it is optional or a condition of service)**

It is a condition of service that you provide the details we request for you to engage in a contract with us.

If you fail or refuse to provide the requested information, or the results of our research are unsatisfactory, you may be asked to provide further information or your application may be declined.

#### **How long do we store it for (retention schedule)**

We intend to store records of applications for 6 years from the end of the year in which the application was made.

This period will be extended if the application is successful, refer to [ongoing client account management](#) for further information.

#### **Will we share it with others (other Controllers or Data Processors)**

Generally, we will not share it with another Controller. In some circumstances we are legally obliged to share information. For example under a court order or where we are required to cooperate with an appropriate supervisory or regulatory authority. In any scenario, we will only share such information that we and our legal advisors are satisfied we have a legal requirement to do so. In such circumstances, the receiving organisation will be considered a Controller in their own right.

We will share it with our data processor that conducts Know your Customer (KYC), Counter Terrorist Financing (CTF) and Anti Money Laundering (AML) screening on our behalf.

#### **Will we transfer it to another country**

We will share it with our data processor that conduct marketing activities on our behalf, our data processor is based in the EEA, with a small number of sales representatives based outside the EEA.

For those representatives based outside the EEA, we have in place specific contracts approved by the European Commission which give personal data the same protection it has in Europe. If you are a client or prospective client, we will provide you with a copy of the clauses of these contracts upon request. To request a copy, please contact us using the contact details provided at [Who we are](#) and we will provide a copy by email.

We will share it with our data processor that conduct KYC, CTF & AML screening on our behalf, our data processor is based in the EEA. The results of the KYC, CTF & AML screening will not be transferred outside of the EEA by us or our data processor.

**Will we employ automated decision-making or profiling techniques**

No, all applications are subject to human decision making.

**Are there any restrictions to your data protection rights**

Yes, in some circumstances, if you request us to rectify, delete or restrict the information which we must maintain in order to follow our legal obligations such as fraud prevention, anti-money laundering or counter terrorism financing we may be required to decline your request and keep that information in line with our normal retention periods.

#### **Part 4 – Ongoing client account(s) management**

Should you become a client, you will be required to enter into a signed contract, which may include separate Terms and Conditions, General Terms and Conditions, Client Agreements or other such contractual agreements. The terms of which should be read in conjunction with this policy. This policy is intended to be an overview of our approach to privacy and does not supersede or invalidate the terms of any such signed agreements.

##### **What purpose we are processing it for (what we will use it for)**

Should you be successfully onboarded and have an active client account with us, we will use the information you provide to manage, maintain, monitor and provide you with the agreed service. This will include business as usual activities such as compliance monitoring, billing and customer relationship management.

In addition, in order to follow our legal obligations such as fraud prevention, anti-money laundering or counter terrorism financing we are required to conduct periodic reviews to re-verify your identity and suitability remain extant.

##### **Why we are permitted to process your information (the lawful basis)**

The lawful basis we rely on in this case are:

- that it is necessary in the performance of a contract with you under article 6(1)(b) of the GDPR, and
- subject to international Anti Money Laundering and Fraud Prevention laws, that it is necessary to comply with legal obligations to which we are subject under article 6(1)(c) of the GDPR

##### **Do you have to provide it to us (if it is optional or a condition of service)**

It is a condition of service that you continue to provide the details we request for you to continue engage in a contract with us.

If you fail or refuse to provide the requested information, or the results of our periodic reviews are unsatisfactory, you may be asked to provide further information or your Client Agreement may be subject to immediate termination.

##### **How long do we store it for (retention schedule)**

We intend to store records of client accounts for 6 years from the end of the year in which the final transaction is made or your relationship with us is terminated, whichever occurs last.

##### **Will we share it with others (other Controllers or Data Processors)**

Generally, we will not share it with another Controller. In some circumstances we are legally obliged to share information. For example under a court order or where we are required to cooperate with an appropriate supervisory or regulatory authority. In any scenario, we will only share such information that we and our legal advisors are satisfied we have a legal requirement to do so. In such circumstances, the receiving organisation will be considered a Controller in their own right.

We will share it with our data processor that conducts Know your Customer (KYC), Counter Terrorist Financing (CTF) and Anti Money Laundering (AML) screening on our behalf.

##### **Will we transfer it to another country**

We will share it with our data processor that conducts Know your Customer (KYC), Counter Terrorist Financing (CTF) and Anti Money Laundering (AML) screening on our behalf, our data processor is based in the EEA.

##### **Will we employ automated decision-making or profiling techniques**

Yes, our systems use artificial intelligence to screen transactions according to a series of risk settings and rules, which are intended to flag identified transactions as potentially fraudulent. Any such automated flags will be reviewed by a human.

**Are there any restrictions to your data protection rights**

Yes, in some circumstances, if you request us to rectify, delete or restrict the information which we must maintain in order to follow our legal obligations such as fraud prevention, anti-money laundering or counter terrorism financing we may be required to decline your request and keep that information in line with our normal retention periods.