



## **EmbassyCard Privacy Policy**

Version 1.0; Date: 06.2020

### **1. Who Are We?**

We are EmbassyCard. Our corporate name is Clayhall Technologies Limited whose registered office is at 9 Ogun Street, Osborne Foreshore Estate, Ikoyi Lagos, Nigeria. Our company registration number is RC 1590378.

We are registered with Information Commission Office, through our partnership organisation Zollikon Tate Limited UK, company registration number 08141852 with Information Commissioner's Office (ICO), the data protection regulator in the UK, to use personal information. Our ICO registration certificate number is **ZA600987**.

We are committed to protecting and respecting your privacy:

We will:

- Always keep your information safe and private;
- Never sell your information; and
- Allow you to manage and review your marketing choices at any time.

### **2. What is Privacy Policy?**

This type of policy tells you:

- What information we might collect about you;
- How we might use that information;
- When we might use your details to contact you;
- What information of yours we might share with others; and
- Your choices about the personal information you give us.



**3. What does this policy cover?**

- This policy covers the services that are offered by EmbassyCard. Sometimes it covers services covered by our partner organisations.
- What is not covered? Our services may link to other services covered by other organization such as banks. Those companies have their own privacy or cookies policies.

**4. How do we protect your personal information?**

We're strongly committed to keeping your information safe. And to do this we design our services with your safety in mind. Your secret details are encrypted in storage, and we do not send your details in transit unencrypted. Information on your EmbassyCard are protected by Cryptography. We also have dedicated teams to look after your information security and privacy.

At the same time, no service can be completely secure - if you have any concerns that your EmbassyCard account or personal information has been put at risk, for example if someone could have found out your password or Memorable word, please call out help desk , or contact us by phone, or email straight away.

**5. Where we store your information?**

Your information is stored in Nigeria where possible, some companies provide services to us in the cloud and run their services from the UK, the European Economic Area, or in Africa zone. We only let that happen if we are satisfied with their levels of security. Keep in mind that when you give us personal information it could be being transferred, stored or processed in a location outside Nigeria.

**6. What types of personal information does EmbassyCard collect about you?**

We'll give you details about why we need your personal information and how we'll use it before you begin, unless it's obvious.

**a. Information that you give us;**



When you open account with EmbassyCard we ask for your name and contact details, your date of birth, personal identity or financial details, depending whether you are a personal customer or a merchant, or on what you're doing on the platform so we can provide you with a tailored service.

**b. Information we ask of you;**

When you update your details or settings, we ask for some personal information, like your secret information.

**c. Device information;**

Devices such as your Point-of-Sale (PoS) terminals, Mobile Phones or Smart Wearable gadgets that are running EmbassyCard apps.

We automatically collect some technical information from these devices and web browsers to protect you in line with KYC strategy and to comply to EU directory Payment System Directory (PSD 2) even when you're not signed into EmbassyCard account. This might include:

- IP Address;
- Device Identity;
- App Identity;
- Card Identity;

**d. Information on your activities outside the EmbassyCard when you talk about us;**

If you have mentioned EmbassyCard in a social media such as Twitter post, we may collect your Twitter handle.

**7. How long will EmbassyCard keep your personal information?**

When you give us any personal information, we'll let you know how long we'll hold it for. We will stick to these principles:



- We only hold your information for as long as we provide you with EmbassyCard Services or have a valid reason to keep it;
- We think about what type of information it is, the amount collected, how sensitive it might be and any legal requirements;
- We design our services so that we do not hold your information any longer than we must; and
- We may close your EmbassyCard account if you have not used it for more than 3 years. We will send you an email or SMS to tell you that we plan to do this before we delete anything, so please check to see if we have sent you any emails about this.

## **8. How can EmbassyCard use my personal information?**

EmbassyCard must have a valid reason to use your personal information. It's called the "lawful basis for processing". Sometimes we might ask your permission to do things, like when you subscribe to an email. Other times, when you'd reasonably expect us to use your personal information, we don't ask your permission, but only when:

- The law says it's fine to use it; and
- It fits with the rights you have.

Knowing how you use EmbassyCard services could lead to the next big technology breakthrough. We use your information for these types of things:

- a.* To open a bank account for you;
- b.* To deliver our services and to provide you with information about them;
- c.* To deal with your requests, complaints and enquiries;
- d.* To check you are not a robot and validate your KYC;
- e.* To personalise your EmbassyCard;
- f.* To personalise services and give you things more tailored to your tastes

Your EmbassyCard account lets us personalise your EmbassyCard.com online experience:

- g.* To show you relevant advertising;
- h.* To help us understand what kind of services you might use;



And sometimes how you might share things with other people;

- i.* To recommend services that might interest you
- j.* To research and innovate using our Dashboard and Analytics
- k.* To contact you about various things;

**9. When will EmbassyCard use your personal information to contact you?**

We might use your information to contact you about different things, like:

- o To update you on any changes to the EmbassyCard policies, practices and Terms of Use;
- o To check with you about any service or activity you have signed up for or to complete your account registration and onboarding. For example, we might tell you if your EmbassyCard Account has not been used for a long term or to assist you to complete your registration or create a sub account;
- o To answer you when you have contacted us, or to respond to a comment or complaint; and
- o To send you transaction notifications on your device depending on your settings.

We will only contact you when we need to or when you have given us permission.

We will never contact you to ask for your EmbassyCard password or Memorable Word or your mother's Maiden Name.

**10. Will you be contacted for marketing purposes?**

We will only send you marketing email or SMS or contact you about EmbassyCard Services.

You can unsubscribe from marketing emails or receiving SMS notifications.

**11. When does EmbassyCard share your personal information with others?**

EmbassyCard will never use your personal information in unethical way. We do share in this way:



- When you make something public. Like make a post or comment in public space;
- When we use other companies to deliver EmbassyCard services;
- When we open a bank account for you with our partner banks;
- When you use another company that connects to EmbassyCard systems;
- When we do collaborative research, data analytics; and
- Sometimes by Law we sometimes must pass your information to other organisations. This may be necessary to protect you or other person from harm.

## **12. Can you delete your information?**

It depends on what information you want to delete.

- If you are talking about EmbassyCard account. You can delete your account at any time. You must keep in mind that your account information is immediately deleted, and you may have digital cash on the platform.

Keep in mind:

- We keep a record of how you have used our services, but this information can't be linked back to you; and
- we also keep anything you have uploaded.

## **13. What are your rights?**

EmbassyCard customers are in control of their personal information.

You have right to:

- Request a copy of your information;
- Not let robots or Artificial Intelligence (AI) make big decisions for you;
- To ask us to correct information that's wrong, to delete it or to request that we only use it for certain purposes; and
- To change your mind and ask us to stop using your information. For example, unsubscribing from any marketing emails, or getting your personal identity removed from your card by removing personalisation.



Bear in mind, sometimes we might not be able to help. Like if the law tells us we can't, or it forms part of our service identity or promotion.

**14. How does EmbassyCard use cookies and similar tracking?**

a. What are cookies and tracking technologies?

Cookies are small text files which are transferred to your computer or mobile when you visit a website or app.

b. Why do we use cookies and other tracking?

To do a few different things:

- To remember information about you, so you don't have to give it to us or sign-on again. And again, to use EmbassyCard services during a single session;
- To keep you signed in, even on different devices;
- To help us understand how people are using our services, so we can make them better;
- To tailor our services to you;
- To help us personalise EmbassyCard.com to you by remembering your preferences and settings. And your progress, so you can pause and pick up where you left off even on a different device; and
- To find out if our emails have been read and if you find them useful.

**15. How can you find out about changes to this policy?**

We update our privacy policy sometimes. If we make important changes, like how we use your personal information, we'll let you know. It might be a notice, an email or a message in your app.

If you don't agree to the changes, then you can always stop using our services, delete your account and stop giving us any more personal information. We'd be sorry to see you go.

**16. How can you contact EmbassyCard?**

Find out more and contact us about your rights.



For any other questions or comments about this policy speak to our Support Service (Data Protection Officer):

- By e-Mail – [contact@embassycard.com](mailto:contact@embassycard.com)
- By Post – Zollikon Tate Limited, 11 Queens Street, Brentwood, Essex, CM14 4HE

We are regulated by the [Information Commissioner's Office](#). through our partnership with Zollikon Tate Limited. EmbassyCard is operational and trading name of Clayhall Technologies Limited, Nigeria. You can contact UK ICO for advice and support.