

Privacy policy

This Privacy Policy describes how iCard AD, Company number 175325806, registered office at Business Park Varna B1, Varna city, 9009, republic of Bulgaria, collects, uses, processes, and discloses your information, including personal information, in conjunction with the use of iCard ATM website.

When this policy mentions “we,” “us,” or “our,” it refers to the respective company – iCard AD, company number 175325806, registered office at Business Park Varna B1, Varna city, 9009, republic of Bulgaria, that is responsible for your information under this Privacy Policy (the Data Controller).

By pressing a button or confirming a box where the words "I agree" or "Confirm" are displayed, you agree to be bound by this Privacy Policy.

By accepting this Privacy Policy, you explicitly agree to the use and disclosure of your personal information on our part and you instruct us to do so in the manner described in this Privacy Policy.

1. GENERAL PRINCIPLES

1. This Privacy Policy forms an integral part of the Terms of Use of the website

We give utmost importance to the protection of personal data of our customers. In the following Privacy Policy, we inform You that your personal information is collected, used and processed in accordance with the principles laid down in the applicable legislation and the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

2. You are required to read this Privacy Policy carefully in order to be familiar with the policies and practices that we will apply in regard to your personal data, how your personal data will be used and how we will treat it. If you do not agree with this Privacy Policy, you should not use our website. By providing us with your personal data once you have become familiar with this Privacy Policy, we will assume that you have agreed to the collection, use and disclosure of your personal data in accordance with the terms and conditions set forth in this Privacy Policy, unless you have notified us otherwise.

2. WHAT INFORMATION WE COLLECT

You are informed that we collect the following categories personal data:

1. Information we process for the purpose of contact

We collect the following information in case you wish to contact us. This information is necessary for the proper and correct communication between us and in case you wish to use our services. Without its collection, we will not be able to provide you with the relevant services.

- Full Name
- Phone Number
- Email Address
- Company Name

- Company URL
 - Country of Registration
2. Information That We Collect With Your Consent

You may choose to provide us with additional personal information. This personal data will be processed on the basis of your consent. Such information could be:

- Any information you disclose in connection with an initiated communication between us for the purpose of providing customer service.
3. Information we process on the basis of our legitimate interest when you use our Website

When you use our website we may collect information, including personal information, about the services you use and how you use them. This information is necessary given our legitimate interest in being able to provide, improve the security and improve the functionalities of the website.

Geo-location Information. When you use our website, we may collect information about your precise or approximate location as determined through data such as your IP address to offer you an improved user experience. Most apps or devices allow you to control or disable the use of location services for applications in the device's settings menu. The legitimate interests that we pursue with this processing is the identification of location-specific problems and other statistical information, which helps us improve our website.

Usage Information. We collect information about your interactions with our website such as your usage of any Apps or Functionalities, and other interactions. The legitimate interests that we pursue with this processing is collection of crash reports and other statistical information, which helps us improve our services.

Cookies and Similar Technologies. For more information on our use of these technologies, see our [Cookies Policy](#).

3. HOW WE USE INFORMATION WE COLLECT

We use, store, and process information, including personal information, about you to provide, understand, improve, and develop our website, create and maintain a secure environment, pursue our legitimate interests and comply with our legal obligations.

1. Communication, provision of information, execution of orders.
 - In order to provide answers to your requests, made through the forms on our website;
 - Maintaining your profile registration on our website;
 - For the purposes of due execution of any order which you have made through our website;
 - Create an account connection between your Account and a third-party account or platform, if applicable;
 - Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking our website or by applying other fraud prevention measures.

- Conduct security investigations and risk assessments.

We process this information given our legitimate interest in improving our website and our clients' experience with it, and where it is necessary for the adequate performance of the contract with you as well as to comply with applicable laws.

2. Provide, Improve, and Develop our website.

- Enable you to access and use our website;
- Process purchase payments, issue invoices and or other kind of payment documents for the processed order;
- Operate, protect, improve, and optimize our website and your experience, such as by performing analytics and conducting research;
- Provide customer service;
- Send you service or support messages, updates, security alerts, and account notifications;
- To operate, protect, improve, and optimize our website and experience, and personalize, customize your experience, introduce you to our other Services, we conduct profiling based on your interactions with our website.

We process this information given our legitimate interest in improving our website, and where it is necessary for the adequate performance of the contract with you.

3. Create and Maintain a Secure Environment.

- Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity;
- Conduct security investigations and risk assessments;
- Enforce our legal rights.

We process this information given our legitimate interest in protecting our website, to measure the adequate performance of our contract with you, and to comply with applicable laws.

4. Provide, Personalize, Measure, and Improve our Advertising and Marketing.

- Send you promotional messages, marketing, advertising, and other information related to our website **and the products and services of unaffiliated businesses** that may be of interest to you based on your preferences and social media advertising through social media platforms such as Facebook, LinkedIn or Google;
- To provide personalized advertising offered by us on third-party websites and online services. We may use your Personal Data and other information collected in accordance with this Privacy Policy to provide a targeted display, feature or offer to you on third-party websites. We may use cookies and other tracking technologies to provide these online services and/or work with other third-parties such as advertising or analytics companies to provide these online services;
- To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information. We will use this information to enhance the security of our website and provide you with location-based content, such as advertising, search results, and other personalized content;

- Personalize, measure, and improve our advertising;
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by us or its third-party partners;
- For participation in games, quizzes and completion of questionnaire or a contest entry form for promotional campaigns;
- Conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with our website, information obtained from third parties) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you.

We will process your personal information for the purposes listed in this section given our legitimate interests in relation to the products we have already offered you and your consent in undertaking marketing activities to offer you products or services that may be of your interest. You have the right to object or opt-out from processing your personal information for the purposes described above by **withdrawing your consent at any time and free of charge**.

4. WITH WHOM DO WE SHARE PERSONAL DATA

1. With other members of the iCard corporate family:

We may share your Personal Data with members of the iCard Group of companies or within our extended family of companies that are related by common ownership or control, so that we may provide the Services you have requested or authorized or to manage the risk, or to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements and to help us manage the availability and connectivity of our websites and communications.

2. With third party service providers:

We may share personal information with third party service providers that support us in providing our website, products and/or Platform with functions at our decision and our behalf.

These third-party service providers may for example:

- perform risk monitoring;
- perform product development, maintenance and debugging;
- allow the provision of our website through third party platforms and software tools (e.g. through the integration with our APIs);
- provide customer support;
- IT support and development services;
- provide technical support;
- promoting by business introducers, distributors, promoters, sales agents or similar;
- perform courier services on our behalf;
- provide cloud, storage or collocations services;
- provide audit and accountancy services;
- provide legal, compliance or other consultancy services;

- marketing and Public Relations services.

These providers have limited access only to your information necessary to perform the tasks for which they were contracted for on our behalf and are contractually bound to protect and to use it only for the purposes for which it was disclosed and consistent with this Privacy Policy.

3. With other third parties for our legitimate interest or as permitted or required by law:

We may share information about you with other parties for our legitimate interest or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to us or our corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any of our Products;
- to protect our property, Products and legal rights;
- to facilitate a purchase or sale of all or part of our business;
- in connection with shipping and related services;
- in relation to promoting our website to end users by third party business introducers;
- to help assess and manage risk and prevent fraud against us, our clients and fraud involving our websites, mobile apps or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals, and merchants;
- to companies that we plan to merge with or be acquired by.

With your consent: We also will share your Personal Data and other information with your consent or direction.

In addition, we may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why users visit our website and services. This data will not personally identify you or provide information about your use of our website. We do not share your Personal Data with third parties for their marketing purposes without your consent.

4. Aggregated Data.

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

5. Business Transfers.

If any of the companies that provides our websites is involved in any merger, acquisition, reorganization, sale of assets, transfer of portfolio, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of 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 policy.

5. PERIOD OF STORAGE OF YOUR PERSONAL DATA

We will store your personal data in accordance with the minimum legal requirements for the storage of the relevant category of personal data. In case there is no legal requirement to keep your personal data, we shall keep your data for a period no longer than 5 years, in case you have become a iCard ATM Client of iCard, or 1 year in any other case.

6. COMPLIANCE WITH LEGAL OBLIGATIONS

We may share your information, including personal data, with courts, pre-trial authorities, governmental authorities or other third parties authorized by law if and to the extent that this is our duty or is permitted under law for (i) the fulfilment of our legal obligations; (ii) the enforcement of procedural rules and defense against claims directed against us; (iii) responding to proper inquiries from authorities investigating crimes or other illegal activities or investigating other conducts that may expose us, you or any of our clients, to legal risk; (iv) the implementation and administration of our Terms and Conditions and any other agreements, policies and legal relationships.

7. SHARING INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

In the event that we transfer any data outside of the EEA, we ensure that appropriate security measures are in place to protect any information that might be considered as your personal data. Such measures could be based on an adequacy decision by the European Commission in the countries outside the EEA, or compliance with internationally agreed standards such as Privacy Shield. We will provide you with additional information on these measures upon request, if applicable.

8. YOUR RIGHTS

You may exercise any of the rights described in this section before the Data Controller by sending an email from your e-mail registered for our website to iCard AD. 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 e-mail 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.

1. Managing Your Information.

You have the right to obtain the following:

- confirmation of whether, and where, the 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, to rectification, to restriction of processing and to object 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; and information about the existence of, and an explanation of the logic involved in, any automated processing;
 - additionally, you may request a copy of the personal data being processed.
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 your online access to your iCard ATM Account).

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.

In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us.

4. Data Retention and Erasure.

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our regulatory obligations. If you no longer want us to use your information to provide our website to you, you can request that we erase your personal information and close your iCard Account, providing your account is in good standing, not blocked or somehow limited for compliance, risk or regulatory reasons, or due to your outstanding obligation to us, court order, pledge or order by another regulator or other reason which prevent us by law to close your account or terminate the Service. Since the Data Controller is a regulated E-money institution the Data Controller is obliged under PSD and AML laws to keep your personal information and all transactions history for a period of 5 years after the termination of the relation with you. 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 and enhancing security.
 - We may retain and use your personal information to the extent necessary to comply with our legal obligations.
 - Because we maintain the iCard to protect 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.
5. 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 changing your Account settings or by sending a communication to us specifying which consent you are withdrawing. 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 where (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 defense of legal claims; or (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

6. 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 defense 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 e-mail to the contact e-mails below.

7. Lodging Complaints.

1. You should in first place try to resolve the matter by sending an e-mail to the Data Controller under this Privacy Policy from your registered e-mail for the Service:

iCard AD, Bulgaria, you may contact us at:

- Data Protection Officer (DPO):

dpo@icard.com

Business Park Varna No B1, Varna 9023, Bulgaria

2. Competent Regulator.

In case you are not satisfied with the reply or resolution of the Data Controller, you have the right to lodge complaints about the data processing activities carried out by us before the competent data protection supervisory authorities as described below.

Commission for Protection of Personal Data, Bulgaria:

Address:

Sofia 1592, 2 Prof. Tsvetan Lazarov blvd.

e-mail: kzld@cpdp.bg

9. 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 Policy. 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.

10. INTERNATIONAL TRANSFERS

1. EU-US & Swiss-US Privacy Shield.

Where we disclose any of your collected personal information outside EEA to USA (if applicable), we shall comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework and any other adequacy decision.

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 have - prior to sharing your information with such corporate affiliate or third-party service provider – established the necessary means to ensure an adequate level of data protection. We will provide further information on the means to ensure an adequate level of data protection on request.

11. SECURITY

We take the responsibility to ensure that your personal information is secure, kept in an encrypted form on servers, collocated in Special data centers in Class A jurisdictions in Europe. To prevent unauthorized access or disclosure of information we maintain physical, electronic and procedural safeguards that comply with applicable regulations to guard non-public personal information. Once you are logged into your Account, all internet communication is secured using Secure Socket Layer (SSL) technology with High-grade

security Encryption (AES-256, 256 bit keys, certified by StartCom Ltd). We restrict access to your personally identifiable information only to employees who need to know that information in order to provide products or services to you.

If you know or have reason to believe that your profile credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your profile, please contact us following the instructions in the Contact Us section below. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current.

12. CAN CHILDREN USE OUR SERVICES?

Our website is not designed for 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 use our website. 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.

13. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on our website. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of our website will be subject to the revised Privacy Policy.

14. CONTACT US

If you have any questions or complaints about this Privacy Policy or our information handling practices, you may email us from your registered e-mail for the Services to the e-mails stated above.