

PayPoint Digital - RSM 2000 Limited

Customer Privacy Notice - AIS and PIS

This privacy notice tells you what to expect us to do with your personal information when you make an Account Information Service ("AIS") or Payment Initiation Service ("PIS") request.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Post

PayPoint Digital, RSM 2000 Limited, 1 The Boulevard, Shire Park, WELWYN GARDEN CITY, Hertfordshire, AL7 1EL, GB

Email

privacy@paypoint.com

What information we collect, use, and why

We collect or use the following information to provide services:

• Banking information including account number and sort code Name Address Email Phone

We collect or use the following information for the operation of customer AIS and PIS requests:



- · Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Account information, including registration details
- Information used for security purposes

We collect or use the following information to prevent, detect, investigate or prosecute crimes:

- Names and contact information
- Customer or client accounts and records
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Financial transaction information

We collect or use the following information for service updates or marketing purposes:

- Names and contact details
- Addresses

We collect or use the following information to comply with legal requirements:

- Name
- Contact information
- Financial transaction information
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Any other personal information required to comply with legal obligations



We collect or use the following personal information for dealing with queries, or complaints:

- · Names and contact details
- Address
- Account information
- Financial transaction information
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal
 information. You can request other information such as details about where we get
 personal information from and who we share personal information with. There are some
 exemptions which means you may not receive all the information you ask for. Read more
 about the right of access.
- Your right to rectification You have the right to ask us to correct or delete personal
 information you think is inaccurate or incomplete. Read more about the right to
 rectification.
- Your right to erasure You have the right to ask us to delete your personal information.

 Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. Read more about the right to object to processing.



- Your 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. Read more about the right to
 data portability.
- Your right to withdraw consent When we use consent as our lawful basis you have the
 right to withdraw your consent at any time. Read more about the right to withdraw
 consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to provide services and goods are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for the operation of customer requests are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.



• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to prevent, detect, investigate or prosecute crimes are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law.

 All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law.

 All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.



• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries or complaints** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you.
- From the bank you are requesting information from or sending information to.

How long we keep information

General Queries – 12 months

Transactions or request – 7 years

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors

Obconnect Limited

This data processor does the following activities for us: Process AIS and PIS requests.



PayPoint Network Limited

This data processor does the following activities for us:

Support services for complaints.

Others we share personal information with

- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Professional consultants
- Your bank when making an AIS or PIS Request.
- Open Banking infrastructure service providers

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint



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1.0	11 July 2025	Published	