

Sage Payments Privacy Policy

Last Updated: 27 April 2015



This is the privacy policy for Sage Payments (UK) Ltd (“we”, “us” or “our”), please read it carefully because it explains how we collect and use information about you and other individuals associated with your business in the scenarios that are described in paragraph 2 below. By taking any of the actions referred to in paragraph 2 below, you agree that we may collect and use information in the ways described in this privacy policy.

1. Who we are

We are a limited company registered in England and Wales under company number 08586408. Our registered office is at North Park, Newcastle upon Tyne, NE13 9AA.

We are authorised by the Financial Conduct Authority under the Electronic Money Regulations 2011 (Register Reference: 900180) for the issuing of electronic money.

We are registered on the Information Commissioner’s Office Register of Data Controllers under registration number ZA026604.

We are part of the Sage group of companies which includes The Sage Group plc. The Sage Group plc and other Sage group companies, such as Sage (UK) Ltd (our parent company), are registered separately with the Information Commissioner (see www.ico.org.uk).

You can contact us on 0845 111 55 55 or by writing to us at our registered office address (see above) or by email to customerservices@sagepayments.co.uk. You can find out further information about Sage Payments on our website at <https://shop.sage.co.uk/sagepayments.aspx>.

2. Information we collect

We will collect and process the following data about you, other individuals and your business.

Information you provide to us

You will provide information to us about you, other individuals and your business when you:

- register your interest in the Sage Payments service via our website; this may include your name and email address;
- apply for a Sage Payments account. The information you provide to us may include name, date of birth,

nationality, address and contact details (including telephone number and email address) relating to you and other individuals associated with your business. You will also provide us with the details of your business including the business and industry type, name, address, bank account information, details of the directors or partners and business owners (e.g. shareholders and beneficial owners);

- use the Sage Payments service; this may include information about you, your business, other individuals associated with your business (such as directors and owners) and information we learn from the transactions you make including payee details;
- interact with us on social media; and
- contact us by telephone, email, post or otherwise.

We also collect information about your use of our products or services using cookies or similar technologies (see paragraph 7 below).

Information we collect about you and others from third parties

In order to protect our customers against potential fraud and to meet our legal and regulatory obligations, we verify the information you provide to us with fraud prevention and credit reference agencies. During the course of the verification we receive information from credit reference and fraud agencies which contains personally identifiable information about you and any other individuals which you may have named during your application for a Sage Payments product or service (or any individuals who may subsequently be named in your Sage Payments product or service at a later date, such as the owners of your business).

You must obtain the consent of any individuals that are named in an application for our products or services, for example business owners (including those individuals that may be named in your product or service at a later date) to disclose their information to us and for us to use their information as set out in this Privacy Policy. If you are unable to obtain such consent please do not disclose the information to us.

If we are unable to verify the information you provide to us with fraud prevention and credit reference agencies then we may ask

you to send additional information to us, such as your driving licence, bank statement or a recent utility bill or any other information which we may require to identify you or any other individuals which you have named during your application for a Sage Payments product or service (or any individuals who may subsequently be named in your Sage Payments product or service at a later date, such as the owners of your business).

3. What we use your information for

You agree that we may use your information (either during your application process or in the future) to:

- perform Know Your Customer and Know Your Business verification and other checks as described in this privacy policy or our product or service terms and conditions;
- compare information for accuracy and to verify it with third parties;
- assess your application for a Sage Payments account; this may include using scoring methods to assess your application;
- detect, prevent and/or remediate money laundering, fraud or other potentially illegal or prohibited activities;
- provide any products, services and information that you have requested from us;
- manage and administer your use of our products and services;
- manage our relationship with you as a customer;
- contact you for feedback on your use of our products or services;
- customise, measure and improve our products and services;
- provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- liaise with regulators, banks and law enforcement agencies (including the police);
- contact you to see if you would like to take part in our customer research; and
- deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of our products and services.

We may use your information for marketing purposes as described in paragraph 6 below.

We may also use your information to undertake internal testing of our system to test and improve the security, performance and provision of our products and services. In these circumstances, we would anonymise any information used for such testing purposes.

We may retain information about you after the closure of your Sage Payments account, if your application for a Sage Payments account is declined or if you decide not to go ahead with it. We may also continue to store and use information from credit reference agencies as described in this policy after your account is closed. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

5. Sharing your information

We may share your information with:

- any company within The Sage Group plc group of companies including Sage (UK) Ltd, for global information and customer relationship management and so that they may provide you with any information, products or services that you have requested;
- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (for example, website hosts and payment processing providers) so that they may help us to provide you with the products, services and information you have requested;
- service providers we use to help us send communications to you;
- other third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- credit reference, fraud prevention and law enforcement agencies;
- our regulator, the Financial Conduct Authority to meet our legal and regulatory obligations;
- our professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- any other person in order to meet our legal and regulatory obligations, including statutory or regulatory reporting;
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets; and
- another organisation to whom we may transfer our agreement with you.

We may pass collective information about the use of our products or services to third parties but this will not include information that can be used to identify you.

We will disclose your information if we are required to by law. We may disclose your information to any UK or overseas regulator, enforcement authority or third party in connection with their duties (e.g. fraud or crime prevention) provided that we can do so without breaching data protection laws.

We may also share your information for certain marketing purposes (see paragraph 6 below).

More about fraud prevention and credit reference agencies

We will share the information you provide to us (including any personal data) with fraud prevention and credit reference agencies to conduct Know Your Customer (KYC) and Know Your Business (KYB) checks on you and your business, including any other individuals you name in your application (or any individuals who may subsequently be named in your product or service at a later date, such as the owners of your business).

You must obtain the consent of any individuals that are named in an application for our products or services, for example business owners (including those individuals that may be named in your product or service at a later date) to disclose their information to us and for us to use their information to conduct KYC checks on them. If you are unable to obtain such consent please do not disclose the information to us.

The data that we may share with fraud prevention and credit reference agencies includes: name; address; business name and address, phone number; proof of identity; company registration number; bank account details (if appropriate) and relevant transaction information (if appropriate).

Fraud prevention and credit reference agencies will use the information we share with them to check the details you have supplied to us against any particulars on any database (public or otherwise) to which they have access. The purposes of the checks are to help us to verify the identity of you and your business and for the prevention and detection of crime, including fraud and money laundering.

Any KYC checks that we undertake will place an enquiry search 'footprint' on the personal credit files of any individual that has been searched. These enquiry searches will not be seen by other organisations if that individual applies for credit in future.

Please note that the fraud prevention and credit reference agencies may use the information we share with them in the future to assist other companies for verification purposes and a record of the search will be retained for audit purposes.

6. Marketing

From time to time, we may use your information to contact you with details about our products and services which we feel may be of interest to you. We may also share your information with our group companies and carefully selected third parties so that they (or we) can contact you with information about their products or services which we feel may be of interest to you. We or they may wish to contact you for this purpose by telephone, post or email.

You have the right at any time to stop us from contacting you for marketing purposes. You may also request at any time that we do not share your information with any of the third parties referred to in this paragraph. If you wish to exercise these rights you can do so by selecting your contact preferences at the point where you provide us with your contact details, or by updating your preferences in your Sage Payments account or by contacting us on 0845 111 5555.

7. Cookies and Traffic Data

Cookies are small text files which are transferred from our products or services and stored on your computer's hard drive. We use cookies to help us provide you with a personalised service and also to help make our products and services better for you. You can select your cookies preferences when you first apply for a Sage Payments account and you can update your preferences at any time by going to the Privacy and Cookies section within your Sage Payments account.

We use the following types of cookies within our products and services:

Strictly necessary

These are cookies which are needed for our products or services to function properly. For example, these cookies allow you to use your log in details to access our product so that we can identify you from the log in details you use.

Functionality

These cookies allow our products and services to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other items that you can customise. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Session Cookies

These are temporary cookies which are deleted when you close your browser or leave your session in the product or service. We use session cookies in our product or service to identify and track users. Our session cookies may also contain your customer account number, company name and email address. We may also use session cookies and similar technologies in our products or services from time to time where this enables us to offer you certain features of the product or service or where it may help us to improve the product or service.

Persistent Cookies

Persistent cookies enable our product or service to "remember" who you are and to remember your preferences (i.e. your cookies preferences). Persistent cookies will stay on your computer or

device after you close your browser or leave your session in the product or service

The specific cookies we use in our products and services are:

Strictly necessary

Description of cookie	Purpose of cookie
ASP.Net_SessionId	This is a session cookie, we use this cookie to remember you and maintain your session whilst you are using our product or service.
FedAuth	This is a session cookie which we use to identify you and maintain your session whilst you are using our product or service.
_RequestVerificationToken	This is for anti-forgery purposes and helps to prevent cross site scripting attacks.

Functionality

Description of cookie	Purpose of cookie
CustomerNotificationDismissed	This is a persistent cookie which we use to remember that a user has dismissed a customer notification message.
trackCookieCount, trackCookiePref and trackCookieVersion	These are persistent cookies which we use to remember the cookie preferences which you have chosen in your product or service.

Please make sure you regularly read this privacy policy so that you can check which cookies we are using as you may wish to update your preferences accordingly.

How to disable cookies or change your cookie preferences

You may be able to configure your browser to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our products or services. For more information about cookies and instructions on how to adjust your browser settings to accept, delete or reject cookies, see the Internet Advertising Bureau website www.youronlinechoices.com.

Software, products and services

Our software, products and services may also include technology that enables us to:

- check specific information directly relevant to your use of the software or products contained in your computer against our records to make sure the software or products are being used in accordance with our software licence agreements and to troubleshoot any problems;
- collect information about how you and your authorised users use the functions of the features of our software or products; and
- gather statistical information about the operating system and environment on which our software or products are installed.

In addition to the purposes described in paragraphs 3 and 5 above, we may also use this information to deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful, based on your use of the software or products or any other information we have about you (depending on the software, you may be able to configure these features to suit your preferences).

8. Transfers outside Europe

Personal data in the European Union is protected by data protection laws but other countries do not necessarily protect your personal data in the same way.

We may use service providers based outside the European Economic Area (which means all the EU countries plus Norway, Iceland and Liechtenstein) ("EEA") to help us provide our products and services to you (for example, banking providers who help us execute your payments) and this means that we may transfer your information to those service providers outside the EEA for the purpose of providing our products and services to you. We also transfer your data outside the EEA when required to execute any International Payments that you instruct us to make.

Our website and some of our products or services or parts of them may also be hosted in the United States and this means that we may transfer any information which is submitted by you through the website or the product or service outside the EEA to the United

States. When you send an email to us, this will also be stored on our email servers which are hosted in the United States.

Where reasonably practicable we take steps to ensure that our service providers and hosting providers that transfer your information outside the EEA put in place the necessary level of protection in respect of your information.

We may also share information with our group companies or affiliates based outside the EEA for global information and customer relationship management purposes. All Sage group companies are subject to Sage group data protection policies designed to protect data in accordance with EU data protection laws.

By using our website, products or services or by interacting with us in the ways described in this privacy policy, you consent to the transfer of your information outside the EEA in the circumstances set out in this privacy policy. If you do not want your information to be transferred outside the EEA you should not use our website, products or services or contact us via email.

9. Your information

If we hold any information about you which is incorrect or if there are any changes to your details please let us know so that we can keep our records accurate and up to date. If you would like to update your records or see a copy of the information that we hold about you, you can contact us at Data Protection Officer, Sage Payments (UK) Ltd, North Park, Newcastle upon Tyne, NE13 9AA. If you request a copy of your information you will need to pay a statutory fee which is currently £10.

10. Changes to our privacy policy

We may change our privacy policy from time to time. We will always include the most recent version on our website, so please try to read it regularly.

11. Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage.

Unfortunately, the internet is not always secure therefore, although we will do our best to protect your personal data, we cannot guarantee the security of your data which is transmitted to us or our products and services via an internet or similar connection and any transmission will be at your own risk.

If we have given you (or you have chosen) a password to access certain areas of our website, product or service please keep this password safe - we will not share this password with anyone.

12. Other sites

If you end your session in our products or services and access another website or service, this policy will no longer apply. We are not responsible for the information handling practices of third party websites or services and we encourage you to read the privacy policies appearing on those websites or services.

13. Further Information

If you would like further information about data protection, or if you would like to view the register of Data Controllers, you can visit the Information Commissioner's site at www.ico.org.uk.