

TPL Privacy Policy

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We are committed to safeguarding the privacy of your information. By “your data”, “your personal data”, and “your information” we mean any personal data about you which you or third parties provide to us.

We may change this policy from time to time so please check this page regularly to ensure that you’re happy with any changes.

Who are we?

Transact Payments Limited (“TPL”, “we”, “our” or “us”) is the issuer of your account and card, and is an independent Data Controller for the personal data which you provide to us. TPL is an e-money institution, authorised and regulated by the Gibraltar Financial Services Commission. Our registered office address is 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA and our registered company number is 108217.

Orenda Financial Services Limited is the Program Manager for your account and card program and is an independent Data Controller for any personal data which you provide which is related to facilitating the management of the card program. Orenda Financial Services Limited is incorporated and registered in England and Wales with registered office at St Martins House, 1 Gresham Street, London, England, EC2V 7BX and company registration number 12404984.

How do we collect your personal data?

We collect information from you when you either apply online or via a mobile application for a payments card which is issued by us or a payments account is opened in your name. We also collect information when you use your card or account to make transactions. We may also process information from the Program Manager, other third-party payment partners and service providers. We also obtain information from third parties (such as fraud prevention agencies) who may check your personal data against any information listed on an Electoral Register and/or other databases. When we process your personal data we rely on legal bases in accordance with data protection law and this privacy policy. For more information see: ***On what legal basis do we process your personal data?***

On what legal basis do we process your personal data?

Contract

Your provision of your personal data and our processing of that data is necessary for each of us to carry out our obligations under the contract (known as the customer terms and conditions or similar) which we enter into when you use our payment services. At times, the processing may be necessary so that we can take certain steps, or at your request, prior to entering into that contract, such as verifying your details or eligibility for the payment services. If you fail to provide the personal data which we request, we cannot enter into a contract to provide payment services to you or will take steps to terminate any contract which we have entered into with you.

Legal/Regulatory

We may also process your personal data to comply with our legal or regulatory obligations.

Legitimate Interests

We, or a third party, may have a legitimate interest to process your personal data, for example:

- To analyse and improve the security of our business;
- To anonymise personal data and subsequently use anonymised information.

What type of personal data is collected from you?

When you either apply for a card or receive an account, we, or our partners or service providers, collect the following information from you: full name, physical address, email address, mobile phone number, phone number, date of birth, gender, login details, IP address, identity and address verification documents.

When you use your card or account to make transactions, we store that transactional and financial information. This includes the date, amount, currency, account balances and name of the merchant, creditor or supplier (for example a supermarket or retailer). We also collect information relating to the payments which are made to/ from your account. If we are required by law to process additional personal data (for example, if we suspect that there may be fraud related to the use of your card or the payment services linked to it), we will also process that extra personal data.

How is your personal data used?

We use your personal data to:

- set up your account (including processing your application for a card and printing your card, if applicable), creating your account and verifying your identity;
- maintain and administer your account, including processing your financial payments, processing the correspondence between us, monitoring your account for fraud and providing a secure internet environment for the transmission of our services;
- comply with our regulatory requirements, including anti-money laundering obligations; and

- improve our services, including creating anonymous data from your personal data for analytical use, including for the purposes of training, testing and system development.

Who do we share your information with?

When we use third-party service partners, we have a contract in place that requires them to keep your information secure and confidential.

We may receive and pass your information to the following categories of entity:

- the program manager, co-brand provider of the website/app through which you access the account and/or card and the wallet platform provider which provides the infrastructure for the account provision;
- any banking partner which provides underlying banking services;
- identity verification agencies to undertake required verification, regulatory and fraud prevention checks;
- information security services organisations, web application hosting providers, mail support providers, network backup service providers and software/platform developers;
- document destruction providers;
- Mastercard, Visa, digital payment service partners or any third party providers involved in processing the financial transactions that you make;
- anyone to whom we lawfully transfer or may transfer our rights and duties under this agreement;
- any third party as a result of any restructure, sale or acquisition of TPL or any associated entity, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us; and
- regulatory and law enforcement authorities, whether they are outside or inside of the United Kingdom (UK) or European Economic Area (EEA), where the law requires us to do so.

Sending personal data overseas

To deliver services to you, it is sometimes necessary for us to share your personal information outside the UK/Gibraltar e.g.:

- with service providers located outside these areas;
- if you are based outside these areas;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under Gibraltar data protection law.

These countries do not have the same data protection laws as Gibraltar. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. We will send your data to countries where the Gibraltar Government has made an adequacy decision meaning that it has ruled that the legislative framework in the country provides an adequate level of data protection for your personal information. You can find out more about adequacy regulations [here](#) and [here](#).

Where we send your data to a country where no adequacy decision has been made, our standard practice is to use standard data protection contract clauses that have

been approved by the United Kingdom government and/or the European Commission. You can obtain a copy of the European Commission's document [here](#) and the UK's document [here](#).

If you would like further information, please contact our Data Protection Officer on the details below.

How long do we store your personal data?

We will store your information for a period of six years after our business relationship ends in order that we can comply with our obligations under applicable legislation such as anti-money laundering and anti-fraud regulations. If any applicable legislation or changes to this require us to retain your data for a longer or shorter period of time, we shall retain it for that period. We will not retain your data for longer than is necessary.

Your rights regarding your personal data?

You have certain rights regarding the personal data which we process:

- you may request a copy of some or all of it;
- you may ask us to rectify any data which we hold which you believe to be inaccurate;
- you may ask us to erase your personal data (where applicable);
- you may ask us to restrict the processing of your personal data;
- you may object to the processing of your personal data (where applicable); and
- you may ask for the right to data portability.

If you would like us to carry out any of the above, please email your request to the Data Protection Officer at DPO@transactpay.com.

How is your information protected?

We recognise the importance of protecting and managing your personal data. Any personal data we process will be treated with appropriate care and security.

These are some of the security measures we have in place:

- we use a variety of physical and technical measures to keep your personal data safe;
- we have detailed information and security policies to ensure the confidentiality, integrity, and availability of information;
- your data is stored securely on computer systems with control over access on a limited basis;
- our staff receives data protection and information security training on a regular basis;
- we use encryption to protect data at rest and anonymization where applicable;
- we have adequate security controls to protect our IT infrastructure and staff computers including but not limited to Identity and Access Management, Firewalls, VPN, Antivirus, Advanced Email Threat Protection and more; and
- we conduct regular audits such as PCI-DSS to ensure we are following adequate security controls to protect your data.

While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorised access, we cannot guarantee it will be secure during transmission by you to the applicable mobile app, website or other services over the internet. However, once we receive your information, we make appropriate efforts to ensure its security on our systems.

Complaints

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your personal information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in Gibraltar is the Gibraltar Regulatory Authority. Their contact details are as follows:

Gibraltar Regulatory Authority,
2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar.
(+350) 20074636/(+350) 20072166 info@gra.gi

Other websites

Our website may contain links to other websites. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

Changes to our Privacy Policy

We keep our privacy policy under review and we regularly update it to keep up with business demands and privacy regulation. We will inform you about any such changes. This privacy policy was last updated on 12th May 2025.

How to contact us

If you have any questions about our privacy policy or the personal information which we hold about you or, please send an email to our Data Protection Officer at DPO@transactpay.com.

Privacy Policy

This privacy policy applies between you, the User of this Website and the Orenda Financial Services Limited (Orenda), the collector and processor of information provided by you through this website. Orenda takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website. Please read this privacy policy carefully.

Definitions and interpretation

Data

Data includes all information that you submit via the Website. This definition incorporates, where applicable, the definitions provided in relevant the Data Protection Laws including but not limited to, the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation; GDPR the General Data Protection Regulation (EU) 2016/679. Orenda Financial Services Limited (12404984) is a limited liability company incorporated in England and Wales, whose registered office is at St Martins House, 1 Gresham Street, London, England, EC2V 7BX.

In this privacy policy, unless the context requires a different interpretation:

The singular includes the plural and vice versa; references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy; a reference to a person includes firms, companies, government entities, trusts and partnerships; "including" is understood to mean "including without limitation"; reference to any statutory provision includes any modification or amendment of it; the headings and subheadings do not form part of this privacy policy.

Scope of this privacy policy

This privacy policy applies only to the actions of Orenda and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

For purposes of the applicable Data Protection Laws, Orenda is the program manager for your account and card program and is an independent 'Data Controller' for any personal data which you provide which is related to facilitating the management of the card and account program. Orenda Financial Services Limited is incorporated and registered in England and Wales with registered office at St Martins House, 1 Gresham Street, London, England, EC2V 7BX and company registration number 12404984.

Transact Payments Limited (TPL) is the issuer of your account and card, and is an independent 'Data Controller' for the personal data which you provide to TPL. TPL is an e-money institution, authorised and regulated by the Gibraltar Financial Services Commission. Its registered office address is 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA and our registered company number is 108217.

Data collected

We may collect the following Data, which includes personal Data, from you:

Name; date of birth; gender; profession; contact Information such as email addresses and telephone numbers; financial information such as credit / debit card numbers; IP address (automatically collected); operating system (automatically collected); in each case, in accordance with this privacy policy.

How we collect Data

We collect Data in the following ways:

- data is given to us by you ;

- and data is collected automatically.

Your data will be collected in a number of ways, for example when you contact us through the Website, by telephone, post, e-mail or through any other means; or when you register and set up an account to receive products/services. In each case the data is collected in accordance with this privacy policy. Data that is collected automatically to the extent that you access the Website, will include for example, information (IP address, date, time, frequency) about your visit to the Website. This information helps us to make improvements to Website content and navigation.

Our use of Data

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Data will be used in accordance with this privacy policy.

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

Who we share Data with

We may share your Data with the following groups of people for the following reasons:

- any of our group companies or affiliates
- the legal entity under the brand you have applied for your account or card
- third party service providers who provide services to us which require the processing of personal data ensure that AML requirements are met
- relevant authorities, if the authorities request this information we will need to provide this by law;

In each case, data will be provided in accordance with this privacy policy.

Keeping Data secure

We will use technical and organisational measures to safeguard your Data, for example: access to your account is controlled by a password and a username that is unique to you.

We store your Data on secure servers. Payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this email address: info@orenda.finance If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data retention

Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

You have the following rights in relation to your Data:

- Right to access – the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly

unfounded or excessive.” Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

- Right to correct – the right to have your Data rectified if it is inaccurate or incomplete.
- Right to erase – the right to request that we delete or remove your Data from our systems.
- Right to restrict our use of your Data – the right to “block” us from using your Data or limit the way in which we can use the data.
- Right to data portability – the right to request that we move, copy or transfer your Data.
- Right to object – the right to object to our use of your Data including where we use it for our legitimate Interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this email address: info@orenda.finance If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner’s Office (ICO). The ICO’s contact details can be found on their website at <https://ico.org.uk/>. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites

This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

Orenda may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Orenda. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to Us. We may also disclose Data to a prospective purchaser of our business or any part of it. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Changes to this privacy policy

Orenda reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations. You may contact Orenda by email at info@orenda.finance.