

Privacy policy

Effective as of 25.05.2018

Last update: 30.09.2024

I. Why should you read this Privacy Policy?

iCard AD is committed to the principles of personal data protection laid down in European law and recognizes the importance of safeguarding its customers' information. We are constantly improving our data processing activities and our privacy notices in order to provide you with as much transparency over the way we handle your data as we can. The present Privacy Policy explains the way we collect, use and store personal information about you, as well as and your rights if you want to change how we use your personal information.

If you have concerns about how we use your personal information, you can contact our data protection officer at dpo@icard.com.

If you are unsure about the meaning of any term used in this Privacy Policy (such as "iCard Account" or "iCard Card"), you may check the definition in the other legal documents regulating the iCard Digital Wallet services to all of which this Privacy Policy forms an inseparable part.

1.1 About us.

When this policy mentions "we," "us," or "our," it refers to iCard AD, Company Number 175325806, seat and registered address at: Varna 9023, Mladost district, Business Park Varna B1, which is responsible for your personal information under this Privacy Policy. The specific responsible entity for your personal data may vary for the different services provided through the iCard services. The responsible entity in each case is referred to as the "Data Controller".

1.2 Personal information of third-parties

In case you have provided us with information about any third party, such as your representatives/holders of power of attorney, employees, your children or spouse we will treat this information with the presumption that you have informed these third persons of the present Privacy Policy and you have received their consent for sharing their information with us. Examples of such cases may include:

- Whenever you order an additional card embossed with the names of a friend;
- Whenever you order a GiftCard (plastic or virtual) in order to gift it to another person;
- Whenever you pay any kind of tax, fee, e-vignette or similar on behalf of another person, including a co-owner or similar;
- Other similar cases.

IMPORTANT:

Processing of personal data in relation to insurance intermediation services:

The present Privacy Policy does not cover any privacy topics concerning the provision of insurance services.

The responsible Data Controller for those type of services is the respective insurance provider that we have allowed to sell insurance policies through our app.

The Data Controller for insurance brokerage, if applicable, is the respective insurance broker.

You will be provided with the Privacy Notices or Privacy Policies of any such Data Controllers whenever you want to use the insurance services, made available through the iCard App.

Processing of personal data in relation to services, provided by Bitpanda:

The present Privacy Policy does not cover any privacy topics concerning personal data related to the provision of the Bitpanda Services (as defined in the Legal Agreement for iCard Digital Wallet and the Access Service Addendum)

In the event that you wish to use these services (and in case they are available in the country in which you are established), you will be presented with general terms and conditions for the use of these services, incl. a separate Privacy Policy of Bitpanda. iCard AD is not a party to these general terms and conditions and will not act as a Data controller for the data

processing related to the provision of this category of services. The specific companies that process your personal data in their capacity of Data controllers in connection with the above, as well as any other required information under the GDPR, is described in [Bitpanda's Privacy Policy](#).

You understand and agree that in the event where you have agreed to become a customer of Bitpanda in relation with the services described above, we will provide Bitpanda with your data used for due diligence within the meaning of applicable anti-money laundering legislation. The specific types of personal data are described in the table below – those, which include the processing purpose "Due diligence".

II. How do we process your personal information?

2.1 What information do we process about you?

We ask for and collect from you the following personal information when you use the Digital Wallet:

Type of personal data	Purpose of processing	Legal grounds	What third-party processors can we use for this?
Names	Due diligence	Compliance with legal obligations; defense of our legal claims	Our auditors; legal or other similar counsels; debt collection agencies; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; Card scheme VISA; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	For card production (embossing of the name on the card)	Our contract with you	None
	Purchase of a bus ticket through our integrated bus ticket service	Our contract with you; Compliance with legal obligations;	Our auditors; legal or other similar counsels; transport service provider
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form
	Facilitating our social features	Our legitimate interests in developing the Platform and drive user interaction	Other users of the Service* This usually happens only in context of social media activities, i.e. in cases where you have tagged us in a post or during promotional events whose specificity demands such data processing. You can always ask us to remove your personal information in this context and we will act upon your request ASAP.
Date and place of birth	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; regulators
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form
	Purchase of a bus ticket through our integrated bus ticket service	Our contract with you; Compliance with legal obligations;	Our auditors; legal or other similar counsels; transport service provider
Registered address	Due diligence	Compliance with legal obligations; defense of our legal claims	Our auditors; legal or other similar counsels; debt collection; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; Card scheme VISA; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar

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Nationality	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Official ID Document and all data contained in it	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; Card scheme VISA; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Recordings of your video verification call with our staff or selfie verification (in case its applicable to you)	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Information about your tax status	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Provide you with the possibility to check and pay your taxes	Our contract with you	Government or municipal tax databases; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Source of income and/or wealth	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Marketing	Legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Expected turnover, profession, purpose of use of the service	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Marketing	Legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Proof of address or other verification data, which we may request depending on your particular situation	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators;
Phone number	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Legal or other similar counsels; support outsourcing providers; Bitpanda Services providers (in case you enrol for their services through us)
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Performance our contract	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form.
	Facilitating login to our platform	Our contract with you	None
	Communicating important messages regarding the Service	Compliance with legal obligations.	Communication service providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators;
	Facilitating Click to Pay service	Our contract with you	Card scheme VISA
Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar	
Purchase of a bus ticket through our integrated bus ticket service	Our contract with you; Compliance with legal obligations;	Our auditors; legal or other similar counsels; transport service provider	

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Email	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Legal or other similar counsels; support outsourcing providers; Bitpanda Services providers (in case you enrol for their services through us)
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form
	Facilitating login to our platform	Our contract with you	None
	Communicating important messages regarding the Service	Compliance with legal obligations	Communication service providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators;
	Facilitating Click to Pay service	Our contract with you	Card scheme VISA
	Providing you with the option to receive tax-deduction statements when you use our iCard Causes functionality	Our contract with you	Communication service providers; charities and other non-profits which we have included in iCard Causes
	Risk and compliance analysis and action	Compliance with legal obligations.	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
Purchase of a bus ticket through our integrated bus ticket service	Our contract with you; Compliance with legal obligations;	Our auditors; legal or other similar counsels; transport service provider	
Device ID and log data (including IP address)	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; regulators; Bitpanda Services providers (in case you enrol for their services through us)
	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers
	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	Support outsourcing providers; software outsourcing providers; legal or other similar counsels; regulators
	Facilitating use of our platform	Our contract with you	None
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Payment Transaction, use of our e-money service	Initiate a payment, send or request money, acceptance of card payment, funding transaction of your iCard account	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers; legal counsels; our auditors; regulators
	Create an account connection between your Account and a third-party account or platform, if applicable	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers; legal counsels; our auditors; regulators
	Administering our loyalty programmes (if applicable to you)	Our contract with you	Other participants in your transactions and their financial institutions; payment scheme operators (if applicable); support outsourcing providers; legal counsels; our auditors
	Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking the services or by applying other fraud prevention measures	Legal obligations	Software outsourcing providers; compliance outsourcing providers; PEN test and other similar auditors; PCI DSS auditors; legal counsels; other similar consultants
	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defense of our legal claims	Lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
Specific client identifiers, and, where applicable, other data such as registered address for a particular service and other similar	Initiate a payment, send or request money, acceptance of card payments, top-up, payments toward specific merchants or entities	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers; legal counsels; our auditors; top-up providers; specific merchants or entities; regulators
	Managing the Cashback functionality (available only in specific countries, as shown in icard.com)	Our contract with you	Cashback/ benefit providers; merchants that are integrated with the cashback functionality; outsourcing providers; legal counsels; our auditors.
Card details (PAN, CVV2, expiration date)	Facilitating Click to Pay service	Our contract with you	Card scheme VISA

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Orders, use and other data related to cards issued by us (including GiftCards and other cards issued by iCard)	Providing you with the option to order and use our payment cards as described in the legal agreement for the Service	Our contract with you	Compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; other participants in your transaction's financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; regulators
	Marketing	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
	Automated card data update. In order to not inconvenience any product or service you have ordered previously, in case of recurring transactions initiated by you and if the supplier is part of the specific Card scheme program for updates, the supplier receives the updated card details.	Our contract with you	Card scheme[1] (VISA, Mastercard, other similar); Merchants towards which you have made a recurring transaction.
	Providing support	Our contract with you	Support outsourcing providers
Login credentials	Customer authentication	Compliance with legal obligations	None
	Facilitating use of our platform	Our contract with you	None
	Providing support	Our contract with you	Support outsourcing providers
Delivery address	Delivering cards and other packages, offered through the Service	Our contract with you	Courier companies; support outsourcing providers; legal consultants; regulators
	Facilitating Click to Pay service	Our contract with you	Card scheme VISA
Geolocation	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers; regulators
	Providing you location-based services	Your consent	Support outsourcing providers
	Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking the services or by applying other fraud prevention measures	Legal obligations	Software outsourcing providers; compliance outsourcing providers; PEN test and other similar auditors; PCI DSS auditors; legal counsels; other similar consultants
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Profile photo	Facilitating our social features	Your consent	Other users of the Service
Stored loyalty cards	Maintaining our legal relationships by continuously providing you an option to add and store your loyalty cards	Our contract with you	None
	Marketing	Our legitimate interests	None
	Providing support	Our contract with you	Support outsourcing providers
Received GiftCards	Maintaining our legal relationships by continuously providing you an option to add and store your received GiftCards (note that the received GiftCards shall be considered to be a payment instrument issued to the sender)	Our contract with you	None
	Marketing	Our legitimate interests	None
	Providing support	Our contract with you	Support outsourcing providers
App preferences	Facilitating use of our platform	Our contract with you	None
	Providing support	Our contract with you	Support outsourcing providers
Contact list	Providing you with an easy way to interact with other users of the platform	Your consent	None
Chats with other iCard users	Facilitating use of our platform	Our contract with you	None – our chat service uses end-to-end encryption and even iCard personnel cannot access your chats
Interactions with our App	Facilitating use of our platform	Our contract with you	None
	Personalize, Measure, and Improve our Advertising and Marketing	Our legitimate interests	Marketing services providers
	Operate, protect, improve, and optimize the iCard services and your experience, such as by performing analytics and conducting research	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers
Interactions with our support team	Providing support	Our contract with you	Support outsourcing providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Interactions with our Social media channels (further information will be provided in our social media-specific privacy policies)	Personalize, Measure, and Improve our Advertising and Marketing	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
Participations in games, quizzes and completion of questionnaire or a contest entry form for promotional campaigns	Provide you with the option to participate in the respective event	Performance of our terms and conditions for the respective event	Marketing services providers
	Personalize, Measure, and Improve our Advertising and Marketing	Our legitimate interests	Marketing services providers

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In-app purchase information (i.e. Garmin Watches)	Service any warranty or other similar claims from you	Compliance with legal obligations	Our repair and warranty service partners, consultants
	Issuing receipts, invoices and other similar	Compliance with legal obligations	Accounting service providers, competent tax authorities, consultants
	Shipping of the purchased goods to your address	Our purchase contract with you	Courier service providers
Purchase of e-Vignettes through an integrated service. Type of Vehicle, county of registration and registration number.	Purchase of e-Vignettes through an integrated service.	Your contract with us;	e-Vignettes service provider - Digitoll Smart Infrastructure is a National Service Provider (NSP), licensed by the Road Infrastructure Agency (RIA) for electronic collection of tolls - e-Vignettes and toll.
	Sending reminders for renewing your e-vignettes	Consent	e-Vignettes service provider - Digitoll Smart Infrastructure is a National Service Provider (NSP), licensed by the Road Infrastructure Agency (RIA) for electronic collection of tolls - e-Vignettes and toll.

Cookies and other tracking technologies	The use of cookies and other tracking technologies is described in our Cookie Policy
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2.2 Specific data sharing

In any case, we may share any of your information for specific reasons, outlined below:

- a. **With other members of the iCard corporate family, for the purposes of our group consolidation.** 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.
- b. **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 on the basis of regulatory compliance, industry and market analysis, demographic or other type of profiling, marketing and advertising, and other business purposes, on the basis of our legitimate interests. This shall not constitute the processing of personal data since the information is anonymized.
- c. **With our legal counsels, auditors and similar for the purposes of protecting our legal rights.** We may share any information which is necessary to protect our legal rights to legal counsels or similar parties.
- d. **Business Transfers.** If any of the companies that provide services 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.

2.3 Decisions based solely on automated processing.

Sometimes, our systems may take decisions based solely on automated processing. This does not mean that we will always use automated decision making for these processing activities. In case you believe that you have been unfairly treated by our automated decision-making systems you may ask that a person reviews the decision at all times by contacting us as described in the "How to file complaints" section. Such decisions may be done for processing activities that include:

Processing activity	Automated processing logic
Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking the services or by applying other fraud prevention measures.	Our fraud-prevention and monitoring systems may sometimes take automated decisions in regards to suspicious behavior. For example, we may block a certain transaction which was made in a remote part of the world just a few minutes after your last login from your home country.

2.4 Information collected about you from third parties.

We may ask certain entities for information about you when you are enrolling for our services. Such entities are generally fraud prevention agencies and Know Your Customer and Anti Money Laundering Checkup service providers which help us to fulfil our legal obligations for due diligence on our customers.

We may also collect information about you from public sources for Anti Money Laundering reasons or market research. This includes:

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- official public records, like your national Company register.
- information published by the press or on social media.

In case you use any of the linked services, provided by one of our partners, such as the insurance services, they may share details with us about your deal.

2.5 Processing based on statutory or contractual requirement, or a requirement necessary to enter into a contract.

Whenever any of the above-described data is being processed based on “Our contract with you”, “Performance of our terms and conditions”, “Compliance with legal obligations” or any similar grounds – this data is required for us to continue to provide you with the particular services and if you do not provide it to us we may have to discontinue the particular services you are using.

2.6 Retention periods.

a. We retain your personal information during the course of our contractual relationships.

We shall keep your data for no more than 5 years after the year of our last interaction, or a shorter/longer period in case it is required by relevant national legislation.

We may however retain some of this data in exceptional cases, i.e. where it is necessary for the defence of our legal rights or in case there is any kind of active and ongoing investigation related in any way to you.

In case you are using only the Starter profile version in our app (without access to the payment services), we will retain your data for no more than 6 months after the date of your last use of your profile, unless you have initiated the process for passing our customer due diligence requirements. In this case we will retain your data for no more than 5 years after the year of our last interaction, or a shorter/longer period in case it is required by relevant national legislation.

b. Because we maintain our records in a manner protecting 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.

c. We reserve the right to retain your identification data for an indefinite duration if you have been placed on our company's internal blacklist due to suspected malicious, fraudulent, or analogous behavior. This retention is predicated on our legitimate interest in preventing such individuals from accessing our services in the future.

III. Your rights

You may exercise any of the rights described in this section before the Data Controller pursuant to the General Terms and Conditions for iCard by sending an email from your e-mail registered for these services to iCard. 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.

3.1 Managing your information.

You have the right to obtain the following:

- confirmation of whether, and where, 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.

3.2 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

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update yourself via your online access to iCard Account).

3.3 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; and
- 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.

- 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.

3.4 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 defence of legal claims; or (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

3.5 Objection to Processing.

In some jurisdictions, applicable law may entitle you to require us not to process your personal information for certain specific 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 defence of legal claims. In case you do not wish us to process your personal data for certain specific purposes, which are legitimate purposes to us, we may have to stop providing you some or all of the services.

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.

We will also provide an opt-out option whenever we are using your personal information for marketing purposes.

3.6 How do I complain?

a. 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:

Data Protection Officer (DPO):

dpo@icard.com

Business Park Varna No B1, Varna 9023, Bulgaria

b. **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

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2 Prof. Tsvetan Lazarov blvd.

e-mail: kzld@cpdp.bg

IV. 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.

V. International transfers

5.1 Adequacy Decisions.

Where we disclose any of your collected personal information outside, we shall comply with any relevant adequacy decision, where possible

5.2 Other means to ensure 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 and a valid legal ground under the applicable data transfer rules. We will provide further information on the means to ensure an adequate level of data protection on request.

VI. Security

We take the responsibility to ensure that your personal information is secure, kept in an encrypted form on servers, collocated in Special data centres 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 iCard Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your iCard Account, 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.

VII. Can children use our services?

The services are 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 services. 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.

VIII. 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 iCard Platform. 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 iCard Platform will be subject to the revised Privacy Policy.

IX. 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 in **Section 3.6**.

iCard

[\[1\]](#) Please bear in mind that the respective Card scheme is a separate data controller for the purposes of the issued card. You may read more about the Card scheme's data processing practices at their official webpage.