

3C Payment commitment to the General Data Protection Regulation ("GDPR")

3C Payment Takes Privacy Seriously

The General Data Protection Regulation (EU) 2016/679 of 27 April 2016 entered into force the **25th May 2018** (commonly called "**GDPR**") replaces the previous national data protection laws based on the Data Protection Directive 95/46/EC of 24 October 1995, strengthening the rights that European individuals have over their data, and creating a uniform data protection regime across Europe.

Certification and Security

We are PCI DSS certified. The secure processing of EMV payments is our daily business. Protecting sensitive card data is of paramount importance to avert fraudulent activity, generate consumer trust and safeguard brand reputation.

Our infrastructure is hosted in a PCI level 1 environment. This means we conform to yearly on-site reviews by an auditor and a network scan by an approved scanning vendor.

No cardholder personal data processing

We do not access any personal data of the card holder for the purpose of our card transaction processing activity. All information we access are anonymous. Therefore, we do not process clients' personal data on behalf of our customers. Furthermore, we are not able to control the processing of clients' personal data made by our own customers.

Business and Data protection

During the business relationship with our customers, we have a legitimate interest to act as controller, processing the personal data of our customers' employees with whom we interact, such as their name, professional email address etc.

The personal data of our customers' employees are processed in accordance with the principles set by GDPR. Which means amongst others that these data will be stored for the time strictly necessary after the end of the business relationship with the customer. Due to legal constraints, some personal data might be processed for a maximum of ten years after the end of the business relationship.

As for UK Master Merchants we also process official identity documents (picture, birthdate, place of birth, signature, address) of employees and beneficial owners for legal purposes.

Security and Data protection

For security purposes, we have a legitimate interest to act as controller processing personal data of the visitors of our premises.

Our visitors are required to sign an entry log with their name, the name of their company and their visiting hours each time they visit our premises. Furthermore, access to the buildings and meeting rooms are secured by a video surveillance system. The personal data of the visitors are processed in accordance with the principles set by GDPR. Which means amongst others that these data will be stored for the time strictly necessary to ensure the security of the premises and maximum for a year.

Employee Training and Awareness

To guarantee the respect of your privacy and the security of personal data processing, our employees complete data privacy and security training. In addition to these training requirements, we conduct ongoing awareness initiatives on a variety of topics, including data protection, security and privacy.

Data Protection Officer

In compliance with GDPR obligations, we have appointed a data protection officer available by email at dpo@3cpayment.com.

3C Payment



Michele Ferraris
CEO
