



## END-USER PRIVACY STATEMENTS

At Citadel Commerce UK Limited ("Citadel"), we believe in being clear and open about how we use your information. The following sections are intended to provide you with the necessary information:

### 1. HOW WE USE YOUR DATA

We capture, process and store data about our consumer end-users, merchant customers, staff and suppliers for the purposes of providing our INSTANT BANKING service.

This includes Personally Identifiable Information (PII) that you provide to us during use of the service and that we may store in our databases. For the avoidance of doubt, we do not store your internet banking login credentials or passwords.

Data routinely captured by our systems includes:

**Consumers:** name, address, email address, bank account number, transaction values, merchants paid

**Merchants:** corporate contact details, contact names, transaction histories, bank account numbers, settlement balances

**Suppliers:** corporate contact details, contact names, contract details and renewal dates

**Staff:** name, address, other contact details, dependents, other standard HR and payroll information

We do not perform electronic marketing using your data, which is retained for the lawful basis of regulatory compliance, fraud prevention and customer service purposes. Data is retained for at least 5 years in compliance with regulatory requirements.

We do not share your data outside our Group of companies trading under the collective name of Citadel and/or Paramount Commerce. Your data may be processed or accessed by our staff based in the UK, Malta and/or Canada, using our IT servers and databases located in Amazon Web Services, Ireland. Where your data is accessed from Canada (outside the EU), we guarantee that the data protection standards applied under our intra-group servicing agreements will at least be as strict as those applied within the EU.

In accordance with the General Data Protection Regulations (GDPR), individuals have a number of rights relating to personally identifiable information we hold about you. This includes the following rights:

- **Right to be informed** – information provided in this document
- **Right of access** – you may submit Subject Access Requests for a copy of data we hold on you
- **Right to rectification** – you can ask us to update or correct incorrect information held
- **Right to erasure** – you can request that we delete data held on you
- **Right to restrict processing** – you can request that we restrict data processing in certain ways
- **Right to data portability** – you can ask us for your data in a commonly used data format
- **Right to object** – you can ask us to stop processing the data
- **Rights in relation to automated decision making** - you can ask us not to perform automated decision making and instead conduct manual review, however this will significantly delay your transaction

In order to exercise these rights, please send a formal request to [support@citadelcommerce.com](mailto:support@citadelcommerce.com)  
We will respond to your Subject Access Request at the latest within one month of receipt.

## 2. COMPLAINTS

Customers and consumers of Citadel can raise any concerns or complaints they have about our INSTANT BANKING service or products by email using the address [support@citadelcommerce.com](mailto:support@citadelcommerce.com)

Consumers wishing to make a complaint are encouraged to contact the Merchant first. Any complaints are made to us free of charge. We will respond within 3 business days, either with a resolution summary or a written acknowledgement that the matter will take longer to investigate, during which period regular updates will be sent to you. Final determination of any complaint will be provided within 8 weeks of receipt.

In the unlikely event you are not satisfied with the outcome, you have the right to complain to the Financial Ombudsman Service who can be contacted via <http://www.financial-ombudsman.org.uk>

If you do not want to accept a decision by the Financial Ombudsman Service and have not used an independent complaints scheme, as a last resort you may be able to take your case to court. Any disputes with Citadel are covered by the laws of England and Wales.

## 3. SECURITY/DATA BREACHES

Citadel takes the security of your data extremely seriously, and deploys a range of industry-standard and proprietary tools to protect this, including a Information Security policy and use of data encryption.

In the unlikely event that you suspect a security or data breach involving our INSTANT BANKING service, please send details to [support@citadelcommerce.com](mailto:support@citadelcommerce.com) and we will investigate the issue as a matter of urgency, with a commitment to provide an initial response within 3 business days.

In the event we are unable to resolve the issue to your satisfaction, you have the right to complain to the UK Information Commissioner's Office who can be contacted at <https://ico.org.uk>

Citadel Commerce UK Limited is registered with the ICO under reference number **Z9656891**.

## 4. OUR USE OF COOKIES

By using our INSTANT BANKING service with Cookies enabled, you accept the use of Cookies in accordance with this Cookie Policy and in addition to the Terms and Conditions provision. If you do not accept the use of Cookies, please disable them as explained below.

Cookies are small text files that are placed on your computer by many websites that you visit. They are typically used in order to make websites work more efficiently by remembering basic information about the sites usage. Cookies are non-harmful and will not damage your computer. You'll find more information about Cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

We use Cookies to deliver a better and more personalized service. They enable us to store information about your preferences, and therefore allow us to customise the transaction process according to your preferences the next time you use the INSTANT BANKING service.

We also use Google Analytics to help us look at how visitors navigate through the application and length of time on each page. No personally identifiable data or information is stored or tracked by us or Google. For more information on Google's Cookie practices, please see Google's privacy policy, located here: <http://www.google.com/intl/en/policies/privacy/>.

If you would prefer to prevent the INSTANT BANKING service from using Cookies on your browser, you can turn them off without impacting your use of the service by updating the privacy properties in your browser settings. Unless you have adjusted your browser setting so that it will refuse Cookies, the INSTANT BANKING service will automatically issue Cookies when you access our pages.

Your use of the INSTANT BANKING by Citadel service constitutes acceptance of this Cookie Policy.