Privacy Policy for bankomo

Last updated: 06 June 2019


Wirecard Bank AG ("Wirecard", "we") and ReiseBank AG ("ReiseBank") respect the data privacy rights of users. This Privacy Policy describes how Wirecard collects, stores, shares and uses personal data about you, and how you can exercise your privacy rights. This Privacy Policy only applies to personal data that we process in relation to bankomo (the "Product"). This Privacy Policy does not describe how ReiseBank processes personal data; if you wish to know more about this, please refer to ReiseBank’s privacy policy. We operate the Product in accordance with the provisions of the European General Data Protection Regulation 2016/679 ("GDPR"), any applicable implementing legislation, and all other provisions with relevance in the area of data protection law.

2. How to contact us

The entities responsible for your personal data are Wirecard Bank AG, Einsteinring 35, D-85609 Aschheim and ReiseBank AG, Eschborner Landstraße 42-50, D-60489 Frankfurt as independent data controllers.

If you have any questions about how Wirecard collects, stores and uses your personal data or would like a copy of the data we hold about you, then please contact us. You can either write to us at the above address or contact us under https://www.wirecard.com/privacy-policy/form.

If you have any questions about how ReiseBank collects, stores and uses your personal data or would like a copy of the data it holds about you, please visit ReiseBank’s privacy policy for further information.

3. What is bankomo?

Wirecard offers its customers products and services relating to electronic payment transactions. The objective is to allow companies and consumers worldwide to carry out electronic payment transactions safely and smoothly. Security and the protection of personal data is one of the most important aspects in the context of handling and processing of payments. This is why Wirecard places particular emphasis on high data protection standards. For more information about Wirecard, please see our website at www.wirecard.com.

bankomo allows customers to make payments using physical payment cards or other transaction means.

4. Collection and processing of personal data for contract fulfillment

4.1 Information you provide when registering for bankomo:

- Full name
- Date of birth;
- Residential address;
- E-mail address and mobile phone number;
- Access data, in particular password and security question with security answer;
- Details of transactions you carry out;
- Information about how you use and manage your bankomo account;
- In addition, we collect device-specific data, such as the device type and manufacturer or the operating system;
- Information on web analysis and AI tools as described below;
- Data on any conversation you have with customer support chatbots.

4.2 Purposes of processing
All of this data is processed for the purposes of setting up your account, for identification required by money laundering legislation and for marketing purposes. In addition, we process the above personal data in order to make bankomo available to you and to carry out payment transactions for you, in order to understand how you use bankomo, to track your in-app behavior, to process queries made by you or to analyze surveys, if you have taken part in a survey.

4.3 Transfer of personal data

Wirecard shares your personal data with other Wirecard companies and third parties as follows:

- Wirecard forwards personal data to other Wirecard companies in order to make bankomo available to you. Specifically, our services use and rely on the back-office processing and storage services of our German affiliate company Wirecard Technologies GmbH and its systems and servers based in Germany. Access to personal data stored on these servers may also be granted to other Wirecard companies for the provision of bankomo, e.g. to Wirecard Communication Services GmbH for customer support services.

- Wirecard, being the card-issuer and the financial institution holding the account for bankomo, is required by law to verify your identity (KYC - Know Your Customer - Process). Wirecard has commissioned ReiseBank and an external service provider to carry out that KYC process. Specifically, ReiseBank and the external service provider will ask for the user data listed above and additionally for the following data:
  - Date of birth;
  - Gender;
  - ID Details (number, expiry date, issuing date, country and respective government agency);
  - Residential details.

ReiseBank and the external service provider process the data types listed above in order to identify you in accordance with the requirements of money laundering legislation by means of the Postident verification process/video chat.

- Wirecard forwards personal data to Mastercard as the card network and payment system in order to make bankomo available.

- Wirecard forwards personal data to law enforcement agencies, regulatory organizations, courts or other public authorities to comply with laws or regulations or in connection with proposed or actual legal proceedings or regulatory actions.

- Wirecard forwards personal data to selected third parties, who may use your personal information to send you marketing messages, if you have given your consent that they may do so.

- We transfer reports containing anonymized data (and no personal data) to ReiseBank.

4.4 Information you provide when you contact us

We will store the personal data provided by you when you contact us (e.g. name, address, telephone number, e-mail address) in our customer relationship management system. We will use such personal data

- to respond to your contact request;

- in anonymized form to support our internal business objectives, namely data analyses, revisions, the development of new products, improvement of this internet presence,
improvement of our services, detection of usage trends and determination of the effectiveness of our advertising campaigns;

- in order to prevent and identify abuse or fraud.

The data collected via the contact form will not be forwarded to third parties.

4.5 Marketing communications

If you have decided to receive marketing communications from us, we use the provided email address and mobile phone number to send email marketing messages and push notifications. You can opt out of receiving e-mails in the bankomo settings or via the opt-out link at the end of the e-mail. Push notification opt-out can be performed in the iOS system settings, or in Android app settings.

4.6 Legal basis for processing personal data

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it. We will collect personal data from you where we need it to perform a contract with you. That is to make bankomo available to you, facilitate payment and to deal with any issues occurring related to bankomo. Besides, it is in our legitimate interest to process your personal data to carry out credit checks, check your identity, for fraud prevention and risk assessment purposes. Furthermore, we process your personal data if required to comply with statutory obligations or court or governmental orders or if we have your consent for the processing which relates to marketing communication and the use of analysis or AI tools such as Facebook Custom Audiences and adjust.

5. How we protect your personal data

Wirecard has appropriate technical and organizational security measures in place to protect your personal information against unauthorized or unlawful use and against accidental loss, damage or destruction. We put in place strict confidentiality agreements (including order processing agreements) with our third party service providers.

6. International data transfers (including to outsourced service providers)

Wirecard will transfer, or permits specific access to, your personal information to business partners, service providers and other Wirecard companies that are located in territories outside of the European Economic Area (“EEA”). We may process payments through other organizations such as banks, payment processors, card networks and payment schemes that are located outside of the EEA. However, if we process your personal data outside the EEA, we have in place appropriate measures such as Binding Corporate Rules, Standard Contractual Clauses or EU-US Privacy Shield certifications providing for an adequate level of protection.

7. Data storage and deletion

Wirecard retains personal data collected from you where we have an ongoing legitimate business need to do so to provide you with a service you have requested or to comply with statutory retention obligations e.g. under tax or accounting law.

When Wirecard does not have any legal basis to store your personal data, it will be deleted.

8. Your data protection rights

If you wish to access, correct, update or request deletion of your personal data, you can do so at any time by contacting us. You can find our contact details under clause 2 of this Privacy Policy.
You can object to processing of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data. To assert these rights, please also contact us. You can find our contact details under clause 2 of this Privacy Policy.

Similarly, if we have collected and process your personal data with your consent, then you can **withdraw** your consent at any time. Your withdrawal of consent does not affect the legality of any processing we carried out before processing your withdrawal.

You have the **right to complain to a data protection authority** about our collection and use of your personal data. For more information, please contact us. You can find our contact details under clause 2 of this Privacy Policy.

Please note that the exercising of these rights refers exclusively to the processing of your data by Wirecard. If you would like information on the collection and use of your personal data by ReiseBank, and you would like to assert your rights vis-à-vis ReiseBank, please contact ReiseBank.

Our data protection officer can be reached under data.privacy@wirecard.com