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1. Background

PAYPORT UK understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.PAYPORTuk.com (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

2. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 14, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”) and Data Protection Act 2018 (DPA 2018); and
“We/Us/Our”	means SimplePay London Limited (trading as PAYPORT UK), a limited company registered in England under company number 11059479, whose registered address is Silverstream House 4th Floor, 45 Fitzroy Street, Fitzrovia, London, England, W1T 6EB.

3. Information About Us

Our Site is owned and operated by SimplePay London Limited (trading as PAYPORT UK), a limited company registered in England under company number 11059479, whose registered address is Silverstream House 4th Floor, 45 Fitzroy Street, Fitzrovia, London, England, W1T 6EB.

Our Data Protection Officer can be contacted by email at gdpr@payportuk.com, by telephone on +44 (0)20 3476 9104, or by post at Silverstream House 4th Floor, 45 Fitzroy Street, Fitzrovia, London, England, W1T 6EB, UK.

We are registered with the Financial Conduct Authority under the Electronic Money Regulations 2011, our FRN is 902044.

4. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

5. Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you (see section 13);
- The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 15);
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 8 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 15 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

6. What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies:

- IP address;
- web browser type and version;
- operating system;
- a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

7. How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 8, below.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- Providing and managing your access to Our Site;

- Personalising and tailoring your experience on Our Site;
- Market research.

With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email with information, news and about our activities. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 14. Please refer to section 14 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- Data described in the Section 6 for no longer than 1 month

8. How and Where Do We Store Your Data?

We only keep your personal data for as long as We need to in order to use it as described above in section 7, and/or for as long as We have your permission to keep it.

Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

Some of the steps We take to secure and protect your data include:

- Encryption;
- Least access privilege policy;
- Cybersecurity policies, procedures and tools.

9. Do We Share Your Data?

Subject to certain circumstances (as described in the second para of this section), We will not share any of your data with any third parties for any purposes. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

10. What Happens If Our Business Changes Hands?

We 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 Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being 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 that data only for the same purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes.

11. How Can You Control Your Data?

In addition to your rights under the GDPR, set out in section 5, when you submit personal data via Our Site, you may be given

options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Your Right to Withhold Information

You may access Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies. For more information, see section 14.

13. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at gdpr@payportuk.com or using the contact details below in section 15.

14. Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a Cookie consent prompt requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible

experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
CookieConsent	Stores the user’s cookie consent state for the current domain	yes
__cfduid	Used by the content network, Cloudflare, to identify trusted web traffic.	yes
_ym_uid	This cookie is used to collect non-personal information on the visitor’s website behaviour and non-personal visitor statistics.	no
_ym_d	Contains the date of the visitor’s first visit to the website.	no
_ym_isad	This cookie is used to determine if the visitor has any adblocker software in their browser – this information can be used to make website content inaccessible to visitors if the website is financed with third-party advertisement.	no
_ym_uid	Collects data on the user’s navigation and behaviour on the website. This is used to compile statistical reports and heatmaps for the website owner.	no
_ym_retryReqs	Registers statistical data on users’ behaviour on the website. Used for internal analytics by the website operator.	no
__vw_tab_guid	Registers data on visitors’ website-behaviour. This is used for internal analysis and website optimization.	no
metrika_enabled	Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor’s preferences.	no
_ym_metrika_enabled	This cookie is used to collect data on the visitor’s behaviour on the website - this information can be used to assign the visitor to a visitor segment, based on common preferences.	no

_ym57023188_lastHit	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	no
_ym57023188_reqNum	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	no
_ym_visorc_57023188	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	no
_ym57023188_lsid	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	no
_ym_metrika_enabled_57023188	This cookie is used to collect data on the visitor's behaviour on the website - this information can be used to assign the visitor to a visitor segment, based on common preferences.	no

and the following third-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Provider
yandexuid	Registers data on visitors' website-behaviour. This is used for internal analysis and website optimization.	yandex.ru
ymex	Registers data on visitors' website-behaviour. This is used for internal analysis and website optimization.	yandex.ru
yuidss	Collects information on user behaviour on multiple websites. This information is used in order to optimize the relevance of advertisement on the website.	yandex.ru
yabs-sid	Registers data on visitors' website-behaviour. This is used for internal analysis and website optimization.	yandex.ru
i	Registers data on visitors' website-behaviour. This is used for internal analysis and website optimization.	yandex.ru
webvisor/5702318	Registers data on visitors' website-behaviour. This is used for internal analysis and website optimization.	yandex.ru
yandexuid	Registers data on visitors' website-behaviour. This is used for internal analysis and website optimization.	yandex.ru

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at gdpr@payportuk.com, by telephone on +44 (0)20 3476 9104, or by post at Silverstream House 4th Floor, 45 Fitzroy Street, Fitzrovia, London, England, W1T 6EB, UK.

16. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.