

J.P. Morgan Mobility Payments Solution S.A.

Data Privacy Notice

This Data Privacy Notice “Notice” contains important information regarding the collection and processing of your personal data by MOBILITY PAYMENTS SOLUTIONS. In addition, it provides information on your rights with respect to your personal data and how you can exercise them.

MOBILITY PAYMENTS SOLUTIONS is a payment solution of J.P. Morgan Mobility Payments Solutions S.A. based in Luxembourg. It is licensed as “Electronic Money Institution” (EMI).

Controller

J.P. Morgan Mobility Payments Solutions S.A. 161, Rue du Kiem, L-8030 Strassen, Luxembourg

Data Protection Officer

If you have any questions regarding data protection, please contact our **Data Protection Officer** by email: dataprotection@jpmmps.com.

Processing of Personal Data

Collection of personal data

We may collect and Process Personal Data about you which we have obtained from a variety of sources as follows:

- When you complete a transaction by making a “**guest payment**” no registration of the customer with EMI takes place. Only individual payment data as well as potentially further personal data is collected by EMI and only individual payment data is processed to complete the transaction. In case of a refund that will be initiated/processed after the initial payment transaction, solely the data of the payment transaction will be processed by EMI. In case of a chargeback, the EMI may request additional customer data such as an invoice document or any kind of evidence that a service was delivered to the customer to the merchant. This data is then shared with the acquirer or other payment providers to go against the chargeback dispute.
- When you complete a transaction after the registration of the customer with the marketplace operator, individual payment data as well as potentially further personal data is collected by EMI to complete the transaction. When you store the payment methods for subsequent transactions with EMI, you become a “**registered user**”.
- We collect or obtain Personal Data when you visit any of our sites <https://www.jpmorgan.com/> <https://www.wallet.jpmmps.com/> or use any features or resources available on or through a Site.

Categories of Personal Data

In the context of our activities, and depending on the services you use, we may Process the following data:

- **Personal details:** first and last name, address.
- **Log in Details:** User Name and Password.
- **Contact information:** (mobile) phone number and e-mail address (contact data).
- **Payment data:** personal data required to process payment transactions, hence order data such as shop name and reference key, shopping cart details, amount to be paid and currency as well as billing and delivery address, payment transaction data such as amount to be paid and currency, number, date and time of a payment as well as credit card and bank connection details such as account holder, account type, account number, validity date as well as verification code of a credit card and bank account details (provider, IBAN, BIC).
- **Usage data:** personal data, either collected automatically when using our services or forwarded to us by participating marketplace operators when processing a payment.
- **Electronic Identifying data:** Such IP address, activity logs, unique device identifiers, online identifiers, device type, operating system, browser type, browser settings, IP address, language settings, dates, and times of connecting to a Site and other technical communications information.

Processing your Sensitive Personal Data We do not seek to collect or otherwise Process Sensitive Personal Data, except where:

- Processing is necessary for compliance with a legal obligation.
- Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law.

Purposes for which we may process Personal Data and legal basis

The purposes for which we may process your personal data and legal bases on which we may perform such Processing are as follows:

- For the provision of our payment services in order to process the transaction payment, to register you as registered user, to verify the payment options(credit card and debit card) available to you, to contact you during the ongoing contractual relationship and thus fulfilment of our contractual obligations under the contracts concluded with you, to provide you with our service to pay at marketplace operators and acceptance points and if necessary to claim reimbursement. This is necessary to fulfil our **contractual obligations** with you.
- For the purpose of risk management, such controls, minimize risk of fraud as well as fraud prevention and to avoid abusive or incorrect use of our payment features for this serves to be compliant with **legal obligations**. We also have a **legitimate interest** in preventing risks that may arise because of abusive or incorrect use by us and our contractual partners (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).
- For fulfilling **our regulatory compliance obligations AML/ KYC** including checks and verifying your identity. We have a **legal obligation** in carrying out the processing for the purposes of preventing money laundering, sanctions violations .

- For on-boarding clients and comply with our internal requirements, policies, etc. The Processing is necessary in connection **with any contract that you may enter into with us**, or to take steps prior to entering into a contract with us; **We have a legitimate interest** in carrying out the processing for the purpose of on-boarding new clients (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).
- Where processing is necessary for checking any previous breaches of contracts with other institutions processing payment instruments prior to entering a contract or during the existence of the contract, to be able to defend our interests in defense or take legal action, to proceed to investigations in case of potential breach of contracts or violation of law or regulation which would have a negative impact on the EMI, We have a **legitimate interest** in carrying out the processing for the purpose of protecting against fraud (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).
- For the management of our IT Operations, IT Audits and IT Security, We have a **legitimate interest** in carrying out the processing for the purpose of managing, operating and testing our IT systems and ensuring the security of those systems (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).
- For internal processes including troubleshooting, performance of data analysis and internal testing, statistical purposes, and development of software solutions in this context, to provide a flawless and failure-free. For optimizing the user interface and ensuring that information for you and the devices you use are displayed as optimally as possible. We have a **legitimate interest** in carrying out the processing for this purpose (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).
- For marketing /prospecting purposes, We may contact you by any means you provided to us to communicate relevant information about used and similar services, and to conduct customer satisfaction surveys if this meets our legitimate interests. We have a **legitimate interest** in carrying out the Processing for the purpose of conducting marketing (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).
- In the case you give us previously **your consent**, we might send you by several channels our product offers, or product offers from other JPMorgan Group companies in the context of our marketing activities. If you do not wish to receive this communication, you can withdraw a consent granted for this purpose at any time and submit your withdrawal to the address mentioned under "Contact" or an online contact option specified there. We will point this out to you again via customer communication in each individual case.

Automated decision-making Process

We do not use your data for profiling purposes or to make automated decisions. If we decide in the future to do so, we will inform you in advance and explain the logic behind such decision-making and the significance and intended consequences of such processing.

Disclosure of Personal Data to third parties

We may disclose your Personal Data to other entities within the J.P. Morgan group, for legitimate business purposes (including providing services to you and operating our Sites), in accordance with applicable law.

In addition, we may disclose your Personal Data to:

- authorities and other public bodies, such as law enforcement agencies, tax and fiscal authorities upon request or where required including for the purposes of reporting any actual or suspected breach of applicable law or regulation; as well as third parties who may have been harmed, provided that we are legally obligated to transmit data.
- Clients of our business, marketplace operators, acceptance points, therefore online merchants, where costumers have made purchases, payment providers, etc.
- Any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).
- Third party processors such as service providers used for identification-verification compliance, due diligence and anti-fraud services.
- Accountants, auditors, financial advisors, lawyers, and other outside professional advisors to J.P. Morgan, subject to binding contractual obligations of confidentiality.
- Any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise, or defence of legal rights in accordance with applicable law.

Our Sites may use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the third-party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

International transfer of Personal Data

Because of the international nature of our business, we may need to transfer your Personal Data within the J.P. Morgan group, and to third parties in connection with the purposes set out in this Policy.

For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements, including data protection laws of a lower standard to those that apply in the country in which you are located.

Where we transfer your Personal Data to other countries, we do so based on:

- adequacy decisions.
- binding Corporates Rules.
- suitable Standard Contractual Clauses; or
- other valid transfer mechanisms.

If you want to receive more information about the safeguards applied to international transfers of personal data and countries to which your data may be transferred, please contact our **Data Protection Officer** by email: dataprotection@jpmmps.com.

Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

Data Retention

We will only store your data for as long as it is necessary to perform the contract concluded with you, to process the payment service or due to mandatory statutory retention obligations. We would like to point out that as an Electronic Money Institution we are subject to specific legal obligations that do not allow us to delete certain information on demand. These obligations result from tax, banking, and money laundering law as well as from accounting regulations and consumer law. However, we may block your data and thereby prevent processing for purposes other than those prescribed by law.

If your data is no longer required for the purposes stated in this agreement, we will automatically delete it. This applies in particular if you unsubscribe from your customer account (registered user), as far as we are not legally obligated or entitled to store your payment method data for a longer period.

Rights of data subjects

Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Data, including:

Right of access - You may, at any time, obtain confirmation as to whether personal data concerning you are being processed and, where applicable, access to such data.

Right to erasure - You may, at any time, by sending us a written request, obtain the erasure of your personal data.

Right to restriction of processing - Where restriction of processing is granted, personal data may only be processed with the consent of the data subject, or for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another natural or legal person, or for important reasons of public interest.

Right to object - You have the right to object, at any time and by sending us a written request, on grounds relating to your situation, to the processing of your personal data based on the legitimate interests we pursue.

We will no longer process this personal data unless it is demonstrated that there are compelling legitimate grounds for the processing that override your interests and rights and freedoms, or for the establishment, exercise, or defense of legal claims. When your personal data is processed for direct marketing purposes, you have the right to object to this processing at any time.

Right to portability - You have the right, by sending us a written request, to receive the personal data concerning you that you have provided to us in a structured, commonly used, and machine-readable format, and to transmit this data to another controller.

Right to withdraw consent - Where processing is based on your consent, you have the right to withdraw consent at any time by sending us a written request. The withdrawal of your consent will not affect the lawfulness of the processing based on the consent made before the withdrawal of it.

Should you not wish us to send information to third parties to show you ads, you can do it through several means such as changing your preferences on your device, browser and/or cookies settings, reviewing the

privacy policies and settings of the social media sites on which you have profiles or sending us an email to the above mentioned email address informing us of your request.

Right to lodge a complaint –you have the possibility to lodge a complaint with the relevant regulatory authority *Commission Nationale pour la Protection des Données* (CNPD - National Commission for Data Protection).

Cookies

A cookie is a small file that is placed on your device when you visit a website (including our Sites). It records information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through cookie technology, in accordance with our [Cookies](#).

Update to this privacy notice

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law.

We encourage you to read this Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Notice.