

Privacy Notice for Cardholders

We take the protection of personal data and thus your privacy very seriously. This notice provides information on how we protect your personal data that we process in the delivery of our services.

1. Who we are and how to contact us?

Commerz Globalpay GmbH (hereinafter, referred to as "CGP") is a data controller of your personal data, which means information that is about you or from which we can identify you. This notice describes how we deal with your personal data.

We are the data controller of this personal data under relevant data protection laws because in the context of our business relationship with you, we decide how and why it is processed in the ways explained in this notice. When we use terms such as "we", "us" and "our" in this notice, we mean CGP.

Our Data Protection Officer can be contacted at any time, including if you have queries about this notice or wish to exercise any of the rights mentioned in it, by emailing dpo@globalpayments.com or by mail to Commerz Globalpay GmbH, Mainzer Landstraße 41–45, 60329 Frankfurt am Main.

2. Where do we get your personal data?

We will generally collect your personal data from the following sources:

- > From you directly, for example, when you enter your PIN and signature at merchant's checkout location;
- > From the Merchant and/or payment terminal as part of the processing of a payment transaction;
- > From card schemes such as Mastercard, Visa and payment networks;
- > From third parties such as law enforcement agencies and network operators' internal databases, where necessary to prevent payment card misuse and to limit the risk of payment defaults;
- > From sources such as fraud prevention agencies, credit reference agencies and public registers;
- > From other members of our GP Group of companies, if you already have a product with them.

3. What kinds of personal data about you do we process?

Depending on the type of transaction, we process the following data as required for safe, efficient and reliable provision of our services:

- > Details of card transactions (merchant name, merchant category, location, transaction date/time, currency, and amount);
- > Bank transfers and payment instructions initiated via your account or card;
- > Associated account numbers, IBANs, or payment reference data;
- > Data required for fraud detection, transaction authentication, verification and authorization including as needed for dynamic payment control;
- > Device Information and other unique identifiers, including device / browser identifiers, internet protocol (IP) addresses, cookies, beacons, pixel tags, or similar unique identifiers when interacting with our services;
- > Information regarding our interactions with you, including, but not limited to, customer service requests, online and telephone communications.

4. What are the legal grounds for our processing of your personal data?

Data protection laws require us to explain what legal grounds justify our processing of your personal data (including when this includes sharing it with other organizations). Here are the legal grounds that are relevant to us:

- > Processing necessary to **comply with our legal obligations**, in accordance with Art 6 Para 1 lit c) GDPR:
 - > To meet our obligations under banking, financial services, AML, and KYC regulations;
 - > To meet security and customer authentication requirements;
 - > To prevent account/card misuse;
 - > To retain data according to AML, KYC and other applicable financial, tax and commercial regulatory retention requirements.
- > Where we consider that it is appropriate for us to do so for processing that is **necessary for our legitimate interests** or in some cases that of a 3rd party, in accordance with Art. 6 para. 1 lit. f) GDPR, including:
 - > To administer and manage our relationship and our services and to keep appropriate records;
 - > To improve our products and services, by reviewing which products you choose, the frequency and type of use, and to test their performance;
 - > To adhere to guidance and best practice under the regimes of governmental and regulatory bodies;
 - > To administer good governance for us and other members of our Group, and for auditing our business operations including accounting and other compliance obligations;
 - > To carry out searches at Credit Reference Agencies;
 - > For fraud prevention and debt recovery;

- > To carry out monitoring (including telephone calls, and where consent is not required by applicable law) as necessary for security, regulatory and quality control purposes;
- > For market research, product surveys, analytics and statistics development;
- > For direct marketing of CGP products and partnership offers (where consent is not required by applicable law), to provide updates about our existing products, the launch of new products as well as products, which are offered together with or by our partners;
- > To maintain the safety and security of our systems, employees and premises.
- > Processing with your **consent** where required by applicable law, in accordance with Art. 6 (1) (a) GDPR:
 - > To send you direct marketing communications;
 - > To share your information with a 3rd party;
 - > To collect information via cookies or similar technologies, where not strictly necessary.

5. With whom do we share your personal data?

- > With Members of the Global Payments Group to facilitate entering a contractual relationship with you and the provision of our products and services to you. A list of the members of our Group with whom we share your data is available on our web-site;
- > With our partners and 3rd parties, including those businesses who provide services directly to Merchants, to facilitate requested products and/or services or to facilitate registration with relevant regulatory authorities, as needed;
- > With the Card Schemes e.g. Visa Europe, Mastercard – Please see their privacy notices as applicable;
- > With your payment service provider (PSP), where applicable;
- > With debt recovery agencies;
- > With our legal and other professional advisers, auditors and actuaries;
- > With governmental and regulatory bodies, law enforcement, or courts when required by law;
- > With market research organizations who help us to develop and improve our products and services;
- > With other organizations and businesses who provide services such as customer service (including customer-facing applications and web portals), back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back-office functions;
- > With buyers and their professional representatives as part of any restructuring or sale of our business or assets.

6. Processing in countries outside the European Economic Area

As our affiliate companies are located around the globe, your personal information may be transferred to and stored in another country outside of the country in which you reside, including in the United States, which may be subject to different standards of data protection than your country of residence.

Subject to your consent if required by applicable law, we may appoint an affiliate or other 3rd party company to process personal data in a service provider role. We will remain responsible for that company's processing of your personal data pursuant to applicable data privacy laws.

We take appropriate steps to ensure that transfers of personal data are in accordance with applicable law, are carefully managed to protect your privacy rights and interests and are limited to countries which are recognized as providing an adequate level of legal protection or where alternative adequate arrangements are in place to protect your privacy rights.

For more information about suitable safeguards and (where relevant) how to obtain a copy of them or to find out where they have been made available, you can contact our Data Protection Officer using the email details above.

7. How long do we retain your personal data?

We retain the personal data we collect for different periods of time depending on what it is and how we use it. In some contexts, we will provide additional information about retention as you use the services. When we collect personal data, we will retain it only for as long as is necessary to complete the legitimate business or legal purposes for which we collect it. The criteria used to determine our retention periods include:

- > The length of time we have an ongoing relationship with you and provide services to you, for example, for as long as you continue to use our services, and the length of time thereafter during which we may have a legitimate need to reference personal data to address issues that may arise.
- > Whether there is a contractual obligation to which we are subject, for example, our contracts with you may specify a certain period of time during which we are required to maintain the data.
- > Whether there is a legal obligation to which we are subject, for example, certain laws require us to keep records of transactions for a certain period of time before we can delete them; and
- > Whether retention is advisable to preserve our legal position, such as in regard to applicable statutes of limitations, litigation or regulatory investigations.

8. Automated decision-making / profiling / scoring

CGP may use automated systems to assess card transactions in real time for fraud prevention and to support Strong Customer Authentication (SCA). These systems may lead to decisions such as transaction approval, authentication requests, or declines.

9. Data anonymization and use of aggregated information

Your personal data may be converted into statistical or aggregated data, which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this notice.

10. What are your rights under data protection laws?

You have certain rights in relation to the processing of your personal data, some of which may not apply in all circumstances. To learn more or to exercise your rights, you can submit a request by completing this [Privacy Rights Request form](#). You may also contact our Data Protection Officer via dpo@globalpayments.com.

- > The right to be informed about our processing of your personal data;
- > The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- > The right to object to processing your personal data, where we are relying upon legitimate interest to process data;
- > The right to restrict processing of your personal data;
- > The right to have your personal data erased (the 'right to be forgotten');
- > The right to request access to your personal data and to obtain information about how we process it;
- > The right to move, copy or transfer your personal data ('data portability'); and
- > Rights in relation to automated decision making that has a legal effect or otherwise significantly affects you.

You have the right to complain to your data protection authority if you believe that our processing does not comply with applicable data protection laws.

This notice was last issued in July 2026 and may be amended from time to time. Updated versions will be posted on our website.