



QTSP PRIVACY STATEMENT FOR THE PROTECTION OF PERSONAL DATA & GENERAL INFORMATION

26 July 2018

Version 1.0

Document History

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Document Approvals

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Document Distribution List

Department	Role/Name	Date

This Privacy Statement aims to give you information on how JCC Payments Systems Ltd collects, uses, discloses and processes your personal data through your use of the <https://trust.jcc.com.cy> and <https://pki.jcc.com.cy> (hereinafter referred to as “the Websites”) and the means by which this is done. The Privacy Statement as a means of notifying the website visitors of their rights in accordance with local law and the EU General Data Protection Regulation (EU) 2016/679.

JCC Payment Systems Ltd is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience.

By accessing, browsing and/or using this Website, you consent to the data practices described in this Privacy Statement and acknowledge that you have read, understood, and agree, to be bound by these terms conditions, and notices contained herein and to comply with all applicable laws and regulations.

For the purposes of this Privacy Statement “Personal Data” refers to all data which relates to a living individual who can be identified from such data such as for instance, name, address and/or identification number. It does not include data where the identity has been removed (anonymous data).

About ‘JCC Payment Systems Ltd’

JCC Payment Systems Ltd is a limited liability company organised and existing under the laws of Cyprus with registration number HE29914 having its registered office address at 1 Stadiou Street, 2571 Industrial Area Nisou, 1500 Nicosia which is primarily engaged in the business of card-processing and acquiring.

JCC has decided to become an eIDAS certified QTSP.

<https://trust.jcc.com.cy> and <https://pki.jcc.com.cy> are secure QTPS services offered by JCC Payment Systems Ltd to you, the customer, to generate and use an Authentication certificate or an EU Qualified Certificate for Electronic Signature/Seal. In case you apply for a Digital Certificate, JCC Payment Systems Ltd (as a Trust Service Provider) required personal information, in order to issue your digital certificates. This information may include your name, email address, physical address, phone number and/or post code or other personal information. In order for you to be informed on all personal information we may ask you for all our different types of Trust Services, please refer to our Certificate Practice Statement (CPS) at: <https://pki.jcc.com/repository>.

JCC Payment Systems Ltd (referred to as ‘we’, ‘us’, ‘our’, ‘JCC Payment Systems’ or the ‘JCC’) is committed to protecting your privacy and handling your data in an open and transparent manner. The personal data that we collect, and process depends on the service requested and agreed in each case.

This privacy statement:

- provides an overview of how JCC collects and processes your personal data and tells you about your rights under the local data protection law and the EU General Data Protection Regulation (‘GDPR’),

- is directed to natural persons who are either current or potential customers of JCC or are authorised representatives/agents or beneficial owners of legal entities or of natural persons which/who are current or potential customers of JCC.,
- is directed to natural persons who had such a business relationship with JCC in the past,
- contains information about when we share your personal data with other third parties (for example, our service providers or suppliers).

In this privacy statement, your data is sometimes called “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing or destructing your personal data or any such action as “processing” such personal data.

For the purposes of this statement, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address, identification number.

1. Who we are

JCC Payment Systems Ltd is a licensed payment institution registered in Cyprus under registration number HE29914 as a private limited liability company having its registered office and head offices at 1 Stadiou Street, 2571 Industrial Area Nisou, P.O. Box 21043, 1500 Nicosia, Cyprus.

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Officer at 1 Stadiou Street, 2571 Industrial Area Nisou, 1500 Nicosia, Cyprus, email: dpo@jcc.com.cy.

2. What personal data we process and where we collect it from

We collect and process different types of personal data which we receive from our customers (potential and current) in person or via their representative or via our alternative channels of communication such as <https://trust.jcc.com.cy> and <https://pki.jcc.com.cy>, in the context of our business relationship.

We may also collect and process personal data from publicly available sources (e.g. the Department of Registrar of Companies and Official Receiver) which we lawfully obtain and we are permitted to process.

3. Whether you have an obligation to provide us with your personal data

In order that we may be in a position to proceed with a business relationship with you, you must provide your personal data to us which are necessary for the required commencement and execution of a business relationship and the performance of our contractual obligations. We are furthermore obligated to collect such personal data given the provisions of the money

laundrying law which require that we verify your identity before we enter into a contract or a business relationship with you or the legal entity for which you are the authorized representative / agent or beneficial owner. You must, therefore, provide us at least with your identity card/passport so that we may comply with our statutory obligation as mentioned above. In case of non-Cypriot nationality, identity is NOT accepted and passport must be accompanied with an official attestation of Passport is required in the case of non-Cypriot Nationality natural person that must be in the Greek or English language

Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

4. Why we process your personal data and on what legal basis

As mentioned earlier we are committed to protecting your privacy and handling your data in an open and transparent manner and as such we process your personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

A. For the performance of our services provided to you

Your information, whether public or private, will not be sold, exchanged, transferred outside of our company and its subsidiaries, or given to any other company for any reason without your consent and will not be used for any other than the purposes specified below:

- Process applications for JCC Payment Systems products and services
- Process your certificate purchase request
- Provide you with technical and customer support
- Issue, revoke and process of digital certificates according to our CPS
- Verify your identity and entitlement to products or services according to our CPS
- Subscribe you to a newsletter
- Solicit your opinion or feedback
- Allow interoperability within our applications

B. For compliance with a legal obligation

There are a number of legal obligations emanating from eIDAS regulation and applicable national law.

C. For the purposes of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Examples of such processing activities include:

- Initiating legal claims and preparing our defence in litigation procedures,

- Means and processes we undertake to provide for JCC's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures,
- Setting up CCTV systems for the prevention of crime or fraud,
- Measures to manage business and for further developing products and services,
- Sharing your personal data with third parties for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework.

D. You have provided your consent

Provided that you have given us your specific consent for processing (other than for the reasons set out hereinabove) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

5. Who receives your personal data

In the course of the performance of our contractual and statutory obligations your personal data may be provided to various departments within JCC. Various service providers and suppliers (sub-processors) may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with JCC by which they observe confidentiality and data protection according to the data protection law and GDPR.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. All data processors appointed by us to process personal data on our behalf are bound by contract to comply with the GDPR provisions.

Under the circumstances referred to above, recipients of personal data may be, for example:

- Supervisory and other regulatory and public authorities, in as much as a statutory obligation exists.
- Companies who assist us with the effective provision of our services to you by offering technological expertise, solutions and support.

6. Transfer of your personal data to a third country or to an international organisation

Your personal data may be transferred to third countries [i.e. countries outside of the European Economic Area] in such cases as e.g. to execute your payment or if this data transfer is required by law or you have given us your consent to do so. Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR.

To what extent there is automated decision-making and whether profiling takes place

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you, in the following cases:

- Data assessments (including on payment transactions) are carried out in the context of combating money laundering and fraud. An account may be detected as being used in a way that is unusual for you or your business. These measures may also serve to protect you.
- Credit scoring is used as part of the assessment of your creditworthiness. This calculates whether you or your business will be able to meet any future payment obligations pursuant to a contract. This helps us make responsible financial security decisions that are fair and informed.

8. How we treat your personal data for marketing activities and whether profiling is used for such activities

We may process your personal data to tell you about products, services and offers that may be of interest to you or your business. Your consent is required in such cases.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services, such as information on your transactions. We study all such information to form a view on what we think you may need or what may interest you. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting at any time JCC in person or in writing.

9. How long we keep your personal information for

As obliged by the eIDAS regulation for Qualified Trust Service Providers we will retain your personal information for a period of seven (7) years from the date that the digital certificate was expired or revoked.

10. Your data protection rights

You have the following rights in terms of your personal data we hold about you:

- Receive access to your personal data. This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it. In order to receive such a copy you can contact us at the email: dpo@jcc.com.cy.
- Object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling inasmuch as it is related to direct marketing. Please note that we will do so only if you have provided your consent.

If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

- Request the restriction of processing of your personal data. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if:
 - it is not accurate,
 - it has been used unlawfully but you do not wish for us to delete it,
 - it is not relevant any more, but you want us to keep it for use in possible legal claims,
 - you have already asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.
- Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name [known as the right to data portability].
- Withdraw the consent that you gave us with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact our Data Protection Officer at the email: dpo@jcc.com.cy. We endeavour to address all of your requests promptly.

Right to lodge a complaint

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by sending an email to our Data Protection Officer at email: dpo@jcc.com.cy. You also have the right to complain to the Office of the Commissioner for Personal Data Protection. Find out on their website how to submit a complaint (<http://www.dataprotection.gov.cy>).

11. Changes to this privacy statement

We may modify or amend this privacy statement from time to time.

We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

14. Cookies

The JCC Payment Systems Ltd Website consists of "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize JCC Payment Systems Ltd pages, or register with JCC Payment Systems Ltd site or services, a cookie helps JCC Payment Systems Ltd to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same JCC Payment Systems Ltd Website, the information you previously provided can be retrieved, so you can easily use the JCC Payment Systems Ltd features that you customized. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the JCC Payment Systems Ltd services or Websites you visit.

Note:

The General Data Protection Regulation (EU) 2016/679 shall apply from 25 May 2018. Until then, the Processing of Personal Data (Protection of Individuals) Laws 2001 till 2012 remain in force