

NPSO LIMITED
PRIVACY AND COOKIE POLICY

NPSO

PRIVACY STATEMENT

Last Updated 31st May 2018

New Payment System Operator (NPSO) understands the importance of protecting your personal information

This privacy policy sets out how and why we collect and use your personal information and your rights in relation to your personal information, when you interact with us and via the NPSO website only.

If you need further details, have a query or have a complaint about our use of your personal information please contact our Data Protection Officer.

- By email at DPO@newpso.uk
- By post at 2 Thomas More Square, London E1W 1YN.
- By telephone on 020 217 8200

We review our privacy policy regularly. Where the policy has been updated this will be clearly identified by reference to the date of the policy above.

1. Introduction

Your privacy is important to us so we have developed this privacy notice to explain how we manage and look after your information. The EU General Data Protection Regulation (the “GDPR”) provides individuals with a number of rights including right of access to their personal information, called a "Data Subject Access Request" as well as right to rectification, erasure (right to be forgotten), restriction, objection and data portability.

Personal data is data which directly identifies an individual, such as their name, address and contact details, or also indirectly identifies an individual with less obvious identifiers, such as website cookies and IP addresses. New Payment System Operator (NPSO) processes a wide range of personal data about its clients, agents, staff and suppliers, and a request could be received from any of these individuals.

NPSO may use your Personal Information:

- to identify you;
- to administer, maintain and host the Site and related business;
- to administer any services we provide to you;
- to compile statistical analysis of the pages of the website you visit;
- to help us develop our business, products, services and our website;
- for internal administration and/or analysis;
- to consider any applications or requests for information or advice made by you;
- if applicable, to consider your application for employment; and
- to comply with any legal or regulatory obligations.

Where your personal information is collected by us it will be stored on our servers located in the UK.

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2. **How NPSO obtains and collect your personal information**

This privacy notice tells you what to expect when we collect personal information about you . It applies to information we collect about:

- Visitors to NPSO website
- People who contact NPSO via post, email or telephone
- Job applications.

2.1. **Visitors to NPSO's premises**

When you visit NPSO's premises NPSO process information requested by NPSO and provided by you or the company you are representing:

- Name;
- Company being represented;
- Date of the visit;
- Who you are visiting;
- Closed circuit television (CCTV).

The processing is carried out on the basis of NPSO's legitimate business interests. Accordingly, this information is processed to maintain security of the organisation and transparency of visitors'

actions to all NPSO colleagues; the processing is necessary to maintain security, comply with local fire regulations, and comply with the Health and Safety at Work Act.

The information is also shared with the Landlord to enable general building security.

2.2. Visiting our website

When you visit NPSO website <http://www.npsol.co.uk>, we place cookies on your device, e.g., computer hard drive, mobile phone) which collect unique identifiers relating to your device automatically. NPSO does this so that it can improve its website's functionality and performance. For example, enabling the site to load quickly, making it easier to move between different pages and remembering you have been shown a one off message.

NPSO cookie policy has more detail.

2.3. Monitoring activity

When you visit the NPSO website NPSO log the visit and capture data. The processing is carried out on the basis of NPSO's legitimate business interests. Accordingly, information is processed to enable NPSO to identify security related events. It is necessary to compile log files and analyse traffic to its site for malicious activity.

2.4. How NPSO use cookies

Last updated: 31st May 2018

Cookies are small text files that are placed on your computer or mobile device when you visit a website. In general they are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

2.4.1. Changing your cookie preferences

Most browsers (Internet Explorer, Safari, Google Chrome etc.) allow cookies to be placed on your device when you visit websites. If you wish to change the way your browser accepts or rejects cookies, or you wish to delete cookies that have been placed on your device, visit www.allaboutcookies.org.

2.4.2. Use of cookies on this site

NPSO Limited may collect information about your computer including your IP address, operating system and browser type for the purposes of, but not limited to system administration, aggregating information and statistical and auditing purposes. An IP address is a number that is automatically assigned to your computer when connecting to the internet. This information does not identify you personally.

NPSO Limited may obtain information about your general internet usage by using cookies. A cookie is a small piece of data or message that is sent from a web server to your browser and is stored on your hard drive. A cookie cannot read data from your hard disk or read cookie files

created by other websites. Cookies help NPSO Limited to improve its websites and deliver a better and more personalised service.

You may refuse to accept cookies or be alerted as to when a cookie is being sent by activating the relevant setting on your browser. If you choose not to accept cookies this Website may not function properly or may be considerably slower.

The table below lists the cookies used on this site and why we use them.

Cookies	Description
has_js	This essential cookie is used by Drupal, the system used to build our website, and the Javascript code it uses. Javascript is a special language used to create advanced effects on websites, such as animated sequences and interactive buttons and menus. It is also sometimes used to display videos. Thus, this cookie enables all functions on the site to run correctly.
Textsize	This essential cookie is used by Drupal, the system used to build our website, and the text size functionality. The cookie records the current text size, if you change the default text size.
Pagestyle	This essential cookie is used by Drupal, the system used to build our website, and the Contrast functionality. The cookie records the current Contrast style selected, if you change the default page style.
Google Analytics _utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our website, which we use to help improve it. The cookies collect information in an anonymous form, including the number of visitors to the site, where visits have come to the site, and the pages they have visited. Google's privacy policy is here: http://www.google.com/analytics/learn/privacy.html

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

2.5. IP addresses

NPSO use IP addresses to analyse trends, administer its website, track users' movements and gather broad demographic information for aggregate use. NPSO also aggregate statistics, traffic patterns and related Site information. Such information is primarily used to provide you with an enhanced online experience. This information is generally not capable of personally identifying you. However where it does you have the right to require us to stop analysing it by contacting us at: press@newpso.uk

NPSO may collect information about your computer including your IP address, operating system and browser type for the purposes of, but not limited to, system administration, aggregating information, statistical and auditing purposes.

An IP address is a number that is automatically assigned to your computer when connecting to the internet. This information does not directly identify you personally.

2.6. People who contact us via post, email, or telephone

Where enquiries are submitted to us, whether via post, email or telephone, we will only use the information supplied to us to deal with the enquiry. The processing is carried out on the basis of our legitimate business interests. Accordingly, this information is processed as necessary to enable efficient communication with clients, potential clients, job applicants, previous employees, members of the public, statutory bodies and regulatory bodies.

We will also monitor emails sent to us, including file attachments, for viruses or malicious software.

2.7. Job applicants

NPSO may provide from time to time a facility on its website to users to apply for NPSO's advertised jobs.

When you apply for a role we ask for your name, phone numbers, and email address. NPSO will also ask you about your previous experience, education, referees, most recent job title, current employer, current salary and salary expectations, skills, competencies, CV and for answers to questions relevant to the role you have applied for.

NPSO's recruitment team will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you do not provide it, it will not affect your application. This information will not be made available to anyone outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide will only be used to produce and monitor equal opportunities statistics.

The processing of job applications submitted via the website follows the same process as applications submitted via any other channel. The data privacy standards used in processing website job applications are set out in our NPSO Staff Privacy Notice which will be made available to you during the job application process.

The processing of your personal information provided via the NPSO website is carried out on the basis of NPSO's legitimate business interests of maintaining our business services model and/or fulfilling to contractual obligations.

3. With whom do we share your personal information?

3.1. Third parties

Other than to those third parties listed below, NPSO will not disclose your Personal Information to any third party unless either NPSO has your permission to do so, or NPSO is, or consider itself to be, under a legal or regulatory obligation to do so.

Your Personal Information may be disclosed to the following recipients, though NPSO will use its reasonable endeavours to control the use of your Personal Information:

- NPSO's third party service providers for the purposes of carrying out their services (including those used by NPSO to complete your orders for products and/or services).
- Any person to whom NPSO propose to transfer any of its rights and obligations under any agreement NPSO has with you.
- NPSO's professional advisers and external auditors.
- Any of NPSO's agents.

3.2. Hyperlinks

This Policy does not cover links within the Site to other third party websites. NPSO is not responsible for the use of any Personal Information including without limitation cookies which you give directly to such third parties, or which third party websites may collect about you (using cookies or otherwise) while you visit pages hosted by them. Please refer to these third party websites' respective privacy policies for information about their use of your Personal Information and their use of cookies.

3.3. Data Export

For the purposes outlined in this Policy, NPSO may send your Personal Information (which includes transfers to other parts of the NPSO Limited) internationally, including to countries outside the EEA (including those where our member banks are located). However, your Personal Information will only be transferred to or from countries outside the EEA as long as those countries have compatible data protection laws and measures in place.

4. How long do we keep your personal information for?

Your personal information is kept in accordance with NPSO's data retention policy which categorises personal data and applies retention periods according to use. Retention periods are determined by reference to applicable data protection laws and the purpose for which the personal information was collected and is used. Legal and regulatory retention requirements, contractual obligations and limitation periods are also part of the retention period determination process.

- Visitor data: 1 month
- Email data: 2 years
- Website data: 1 month

5. How does NPSO protect your Personal Information

NPSO understands the importance of ensuring its systems are secure from unauthorised access, use or disclosure so that emails and forms that contain your personal information are safe. It has internal policies, procedures and controls in place to ensure this.

6. Your Rights

GDPR gives you a number of rights regarding your personal information that is processed by us:

- The right to be informed: our obligation to provide fair processing information;
- The right of access: allows you to be aware of and verify the lawfulness of the processing;
- The right to rectification: allows you to request the data is rectified if it is inaccurate or incomplete;
- The right to erasure: allows you to request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- The right to restrict processing: allows you to 'block' or suppress processing of personal data;
- The right to data portability: allows you to obtain and reuse your personal data for your own purposes across different services;
- The right to object: you must have an objection on grounds relating to your particular situation.

You can contact NPSO directly by post, email, or telephone, to exercise your rights, as set out below.

7. Queries or complaints

This privacy notice does not provide exhaustive detail of all aspects of NPSO processing of personal information. However, NPSO is happy to provide any additional information or explanation needed.

NPSO try to meet the highest standards when processing personal information. For this reason, we take any complaints we receive about this very seriously. NPSO encourage people to bring it to its attention if they think that NPSO's collection or use of information is unfair, misleading or inappropriate.

If you would like to exercise any of these choices, please get in touch via our Data Protection Officer

- By email at DPO@newpso.uk
- By post at 2 Thomas More Square, London E1W 1YN.
- By telephone on 020 217 8200

or use the contact us form on our website. Where we have shared your personal information with other companies, we will let them know if you exercise any of these choices.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner who can be contacted at www.ico.org.uk or by telephone on 0303 123 1113.