

PRIVACY POLICY

Last updated December 17, 2018

This privacy policy applies between you, the User of this Website and PAYCORE.IO LIMITED, the owner and provider of this Website. PayCore.io Limited takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website. Capitalised terms in this privacy policy are defined in the section headed “Definitions and interpretation” at the end of this privacy policy if not otherwise defined in the provisions below.

For the purpose of the Data Protection Act 1998 (the “Act”), the data controller is PayCore.io Limited and any questions relating this policy should be directed to PayCore.io Limited at St. Martin’s House, 16 St. Martin’s Le Grand, London, EC1A 4EN, United Kingdom.

PayCore.io Limited has registered as a data controller with the Information Commissioner’s Office under the registration number ZA476916. For more information, please follow the link:

<https://ico.org.uk/ESDWebPages/Entry/ZA476916>. This privacy policy should be read alongside, and in addition to, the Website Terms of Use, which can be found at <https://paycore.io/terms-and-conditions>.

PLEASE READ THIS PRIVACY POLICY CAREFULLY.

Interpretation

1. In this Privacy Policy, unless the context requires a different interpretation:
 - (a) the singular includes the plural and vice versa;
 - (b) references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
 - (c) a reference to a person includes firms, companies, government entities, trusts and partnerships;
 - (d) reference to any statutory provision includes any modification or amendment of it;
 - (e) the headings and sub-headings do not form part of this privacy policy.

Limitations on Liability and Disclaimers

2. This privacy policy applies only to the actions of PayCore.io Limited and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
3. As the data controller, PayCore.io Limited determines the purposes for which and the manner in which, your Data is processed.

Data collected

4. We may collect the following Data, which includes personal Data, from you:
 - (a) name;
 - (b) job title;
 - (c) profession;
 - (d) contact Information such as email addresses and telephone numbers;
 - (e) demographic information such as postcode, preferences and interests;
 - (f) financial information such as credit/debit card numbers;
 - (g) IP address (automatically collected);
 - (h) web browser type and version (automatically collected);
 - (i) operating system (automatically collected);
 - (j) a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

(k) in each case, in accordance with this privacy policy.

How we collect Data

5. We collect Data in the following ways:
 - (a) data is given to us by you;
 - (b) data is received from the other sources; and
 - (c) data is collected automatically.

Data that is given to us by you

6. PayCore.io Limited will collect your Data in a number of ways, for example:
 - (a) when you contact us through the Website, by telephone, post, e-mail or through any other means;
 - (b) when you register with us and set up an account to receive our products/services;
 - (c) when you make payments to us, through this Website or otherwise;
 - (d) when you elect to receive marketing communication from us;
 - (e) when you use our services;
 - (f) in each case, in accordance with this privacy policy.

Data that is received from third parties

7. PayCore.io Limited will receive Data about you from the following third parties:
 - (a) Amazon Web Services, Inc., Amazon Web Services EMEA SARL or its affiliates;
 - (b) Google LLC or its affiliates.

Data that is received from publicly available third parties' sources

8. We will receive Data about you from the following publicly available third-party sources:
 - (a) LinkedIn Corporation or its affiliates;
 - (b) Google LLC or its affiliates;
 - (c) Facebook, Inc. or its affiliates;
 - (d) Twitter Inc. or its affiliates;
 - (e) UK Government Digital Service (GDS);
 - (f) Foreign company registers.

Data that is collected automatically

9. To the extent that you access the Website, we will collect your Data automatically, for example:
 - (a) we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation. and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 - (b) we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For some information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

Our use of Data

10. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 - (a) internal record keeping;
 - (b) transmission by email of marketing materials that may be of interest to you;
 - (c) payment transactions execution;
 - (d) payment data processing;in each case, in accordance with this privacy policy.

11. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed “Your rights” below).
12. For the delivery of direct marketing to you via e-mail, we will need your consent, whether via opt-in or soft-opt-in:
 - (a) soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under “soft opt-in” consent, we will take your consent as given unless you opt-out.
 - (b) for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we’ll provide.
 - (c) if you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed “Your rights” below.
13. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
14. We may use your Data to show you PayCore.io Limited adverts and other content on other websites. If you do not want us to use your data to show you PayCore.io Limited adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed “Cookies” below).

Who we share Data with

15. We may share your Data with the following groups of people for the following reasons:
 - (a) any of our group companies or affiliates – to ensure the proper administration of your website and business;
 - (b) our employees, agents and/or professional advisors – to obtain advice from professional advisers; in each case, in accordance with this privacy policy.

Keeping Data secure

16. We will use technical and organisational measures to safeguard your Data, for example:
 - (a) access to your account is controlled by a password and a username that is unique to you.
 - (b) access to Website occurs only over a secured channel and may require two-factor authentication (2FA).
 - (c) we store your Data on secure servers and use the third party software component for access management security, which has been evaluated as conformant with the U.S. Federal Information Processing Standard (FIPS) 140-2 standards.
 - (d) payment details are encrypted using SSL (Secure Socket Layer) or TLS (Transport Layer Security) technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).
17. We adhere and/or are certified to the Payment Card Industry Data Security Standard ([PCI DSS](#)). This family of standards helps us manage your Data and keep it secure.
18. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: info@paycore.io.

Data retention

19. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.

20. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

21. You have the following rights in relation to your Data:
 - (a) **Right to access** – the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information, we hold about you, we will not charge you for this, unless your request is “manifestly unfounded or excessive.” Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
 - (b) **Right to correct** – the right to have your Data rectified if it is inaccurate or incomplete.
 - (c) **Right to erase** – the right to request that we delete or remove your Data from our systems.
 - (d) **Right to restrict our use of your Data** – the right to “block” us from using your Data or limit the way in which we can use it.
 - (e) **Right to data portability** – the right to request that we move, copy or transfer your Data.
 - (f) **Right to object** – the right to object to our use of your Data including where we use it for our legitimate interests.
22. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this email address: info@paycore.io.
23. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to relevant data protection authority. For the UK, this is the Information Commissioner’s Office (ICO). The ICO’s contact details can be found on their website at <https://ico.org.uk>.
24. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites

25. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes in business ownership and control

26. PayCore.io Limited 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 PayCore.io Limited. Data provided by Users will, where it is relevant to any part of our business so 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 the Data for the purposes for which it was originally supplied to us.
27. We may also disclose Data to a prospective purchaser of our business or any part of it.
28. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Cookies

29. This Website may place and access certain Cookies on your computer. Paycore.io Limited uses Cookies to improve your experience of using the Website and to improve our range of services. Paycore.io Limited has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
30. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
31. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling PayCore.io Limited to provide a better experience and service to you. You may, if you

wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

32. This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They may include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart, hosted payment page, hosted payment fields or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

- 33. You can find a list of Cookies that we use in the Cookies Schedule.
- 34. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.
- 35. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- 36. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance by the developer of your internet browser if you are unsure about adjusting your privacy settings.
- 37. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

General

- 38. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 39. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 40. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

Governing Law

41. This Website and the Content (excluding Linked Websites or their content) are physically located within the EU. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Children

42. Please note that PayCore.io Limited and its Website are not intended for children under the age of 16. PayCore.io Limited is committed with the protection of children’s privacy, particularly in an online environment. To our best knowledge, PayCore.io Limited does not collect personally identifiable information from children under 16 without parental authorisation. If a parent or guardian becomes aware that his/her child has provided Data to PayCore.io Limited without his/her authorisation, please contact us at info@paycore.io.

Changes to this privacy policy

43. PayCore.io Limited reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

Contacting PayCore.io

44. If you have any questions about this Privacy Policy, or if you wish to exercise your rights mentioned under clause 21 please contact our Data Privacy Officer Mr Denys Melnykov via mail at this address: PayCore.io Limited, 16 St. Martin’s Le Grand, London EC1A 4EN, United Kingdom; or email address info@paycore.io according to the procedure described in clause 22.

Cookies that we use

45. Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Description of Cookie	Purpose
Strictly necessary cookies	These cookies are essential in enabling you to move around our website and use its features. Without these cookies, services you have asked for cannot be provided. These are first party cookies.
Analytical cookies	<p>The use of cookies allows us and our advertisers to deliver information more relevant to you and your interests and they may also connect you with social media networks. These are persistent cookies which will be kept on your device until their expiration or earlier manual deletion. We make use of third party cookies, including the Google Analytics cookie and the Google Advertising cookie.</p> <p>Our use of the Google Analytics is as foreseen on Google’s policy “How Google Uses Information from Sites or Apps That Use Our Services” available at https://policies.google.com/technologies/partner-sites, which you completely agree with when accepting this Privacy Policy. Any use made by Google and its partners of the user data collected through these tools will be the sole liability of Google, holding PayCore.io Limited harmless of any resulting liability.</p>

Performance cookies	These cookies collect anonymous data about how visitors use our website. They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it and the approximate regions that they are visiting from. These are first party cookies.
Functionality cookies	These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites. These are first party cookies.
Cookie consent and opting out	<p>When you arrive on our website a pop-up message will appear notifying you that our website uses cookies. By using our website, you are consenting to our use of cookies. If you, or another user of your device, wish to withdraw your consent at any time, you can do so by altering your browser settings, otherwise, we will assume that you are happy to receive cookies from our Website.</p> <p>In addition to the paragraph above, should you not wish us to use Analytics and Advertising cookies, you can access the following page to deactivate Google Analytics: https://tools.google.com/dlpage/gaoptout.</p>

Definitions and interpretation

46. In this Privacy Policy, the following definitions are used:

Definition	Interpretation
“Data”	collectively all information that you submit to PayCore.io Limited via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
“Cookies”	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause above (Cookies that we use);
“Data Protection Laws”	any applicable law relating to the processing of Personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
“GDPR”	the General Data Protection Regulation (EU) 2016/679;
“PayCore.io Limited”, “we”, “us”, “our” and “ourselves”	refers to PayCore.io Limited, a company incorporated in England and Wales with registered number 11654625 whose registered office is at St. Martin’s House, St. Martin’s Le Grand, EC1A 4EN London;
“UK and EU Cookie Law”	the Privacy and Electronic Communication (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communication (EC Directive) (Amendment) Regulations 2011;

"User or you"	any third party that accesses the Website and is not either (i) employed by PayCore.io Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to PayCore.io Limited and accessing the Website in connection with the provision of such services; and
"Website", "Web site" or "Site"	the Website that you were browsing when you clicked on a link to this Privacy Policy, including all subsidiary pages, https://paycore.io , and any sub-domains of this site unless expressly excluded by their own terms and conditions.