

## Privacy Notice – Tuxedo Money Solutions

This privacy notice covers who we are, what we do with your information, who we share it with, how we protect it from misuse and offers advice on the security of your money. It is split into the following main areas:

- Who we and our partners are
- Collecting, using and storing your personal information
- Marketing consent and partners
- Web security advice

### Who we are

Tuxedo Money Solutions Ltd and Tuxedo Money Plus Ltd (together “Tuxedo”) operate in the world of payment solutions and electronic money. Both companies are registered with the Information Commissioner’s Office as data controllers because we handle your information to provide prepaid cards, e-wallets and cardholder services on behalf of e-money issuers and partners.

All personal information is processed in line with the requirements of the Data Protection Act 1998 and The Privacy and Electronic Communications (EC Directive) Regulations 2003.

IDT Financial Services Ltd (“IDT”) is the regulated e-money issuing bank and is also a data controller. IDT is subject the Gibraltarian Data Protection Act. References to “we” or “us” relate to IDT or Tuxedo acting on its behalf.

### Partner

The prepaid card partner is B2BTradeCard Limited and your information is shared with them. This includes personal transactional and usage information, as well as marketing consent where you have given us this permission. For information on how B2BTradeCard will process your personal information, please refer to **their privacy policy** at [www.b2btradecard.com/terms/privacy-policy](http://www.b2btradecard.com/terms/privacy-policy).

### Collecting your personal information

When you apply for a product or service from us (typically via online secure webpages), you will be asked for personal information needed to process your application. The information that you provide will only be used by us for the purposes outlined in our Terms and Conditions that apply to your product, and as outlined in this Privacy Notice.

### How we use your personal information

We will use your information together with other information and store it on our computers to:

- Provide customer services and to manage your prepaid card
- Personalise aspects of our overall service including our communications with you
- Learn from your use, for example from the transactions you make and the payments made using your card
- Help us develop and improve our services to you
- Fulfil our obligations with respect to anti-money laundering and fraud prevention
- Make sure we follow your instructions correctly and to improve our service to you through training of our staff. We may monitor or record telephone calls.
- Provide you with essential service messages about the use of your prepaid card.

We will not disclose any such information outside of Tuxedo or IDT except:

- To our Partner identified in this Privacy Notice
- To organisations who may use the information to prevent fraud and money laundering;
- To persons acting as our agents or service providers under a strict code of confidentiality;
- To anyone to whom we transfer or may transfer our rights and duties under our terms and conditions with you;
- As required by law or regulation;
- For such purposes that you have given us consent to do so.

### **Storing and maintaining your personal information**

You can see, review and change your personal information by logging on through the B2BTradeCard website and accessing the Tuxedo secure pages or by calling us. Please ensure you update your personal information if it changes or is inaccurate. Should you request that your prepaid card be closed, please be assured that this will be done as soon as is reasonably possible. Personal information from a closed prepaid account is retained in order to comply with legal obligations, prevent fraud, collect any fees owed, resolve disputes and troubleshoot problems.

### **Marketing Consent and Partners**

We will share your information with our Partner, who along with Tuxedo, may contact you either by email, telephone, in writing or by SMS to let you know about any goods, services or promotions, which may be of interest to you. We will always give you an opportunity to opt out of receiving these communications at the point where you give us your details. Should you wish to stop receiving these communications in the future you will need to unsubscribe using the services provided by our Partner.

### **Personal Information passing outside the European Union**

To provide the prepaid card services we are likely to transfer your information to a service provider or agent in another country outside the European Union. For example, we have a long-standing relationship with a call centre in India. Where we make such a transfer we will have a contract in place to ensure that your information is suitably protected and to use your information only for the purpose of providing the service to us.

### **Information Requests**

You have a right to ask for a copy of your information (for which we charge a small fee) and to ask us to correct any inaccuracies in your personal information (which is free). Please refer to the Contact Information at the end of this notice.

### **Changes to this Privacy Notice**

From time to time, we may make changes to the Privacy Notice. This may be in relation to changes in the law, best practice or changes in our services. It is your responsibility to check the website at [www.b2btradecard.com](http://www.b2btradecard.com) regularly for changes to this Privacy Notice. We will assume that you have done so, and will be entitled to assume you have accepted any changes to this Privacy Notice if you have not told us that you do not accept the change prior to the date the change takes effect and continue to use the prepaid card. If you do not accept a change, you may end your Cardholder Agreement in accordance with the Terms and Conditions. Significant changes to this Privacy Notice which may materially impact you, will be advised to you by email.

This Privacy Notice was last updated 24<sup>th</sup> July 2015.

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## Web Security and Cookies

The following section explains web security, what measures we take to protect your data and what you can do to protect yourself from online fraud. These details relate to the online account section of the Partners website, used to service your card.

## Your Security Details

During the registration process you will provide an email address and create a password (your security details) which must be used in order to access certain restricted parts of our websites. Additionally, you will be asked to provide the answer to a 'secret question'. These are used by us to identify you and are very important. You are responsible for all activity conducted using your security details. If you become aware or suspect someone else is using your security details - you should notify us immediately.

## What we do

- Our forms and online pages within operate on 256-bit secure encryption which makes your information unreadable to anyone who might intercept it. Look for the padlock symbol in your browser address bar.
- A team of independent security experts regularly tests our Websites.
- Your web session within your secure online account will time out after 15 minutes of inactivity.
- Access to the secure online account section, using your security details, will be locked out after three failed access attempts. You will need to call us to reset it.
- We will verify your identity before disclosing confidential information over the telephone or re-setting your password.
- We do not guarantee our websites will be fault free and do not accept liability for any errors or omissions that occur.
- Provide you with websites that don't need 'plug-ins' to work effectively, an example is Flash Player from Macromedia.

## What you should do

- Never reveal your password to anyone or write it down.
- Do not use a password that could be easily guessed by someone else.
- Change your password immediately if you suspect someone else could know it.
- Keep Your PC updated with current anti-virus software and the latest browser versions.
- Do not send us any confidential information (such as your 16 digit card number or your password) via email because this is not secure. We cannot accept responsibility for unauthorised access by a third party and/or the corruption of data sent to us by email.
- Treat emails you receive with caution. Remember we will never ask you for your personal information or security details to us by email.

We recommend that you regularly visit the [www.banksafeonline.org.uk](http://www.banksafeonline.org.uk) website to keep up to date with tips to protect yourself from the latest scams.

## Other Security Information

All recently available browsers (e.g. Chrome, Firefox and Internet Explorer) support 256-bit encryption. Some older browsers support lower levels of encryption (128-bit) but they still remain extremely secure.

We will only use email to send you information such as your account balance and transaction information. We will not use email to send other confidential personal information to you. It is our policy that if any of our customers are victims of unauthorised access and provided that you have not breached our security procedures, acted fraudulently or without reasonable care, we will cover any direct financial loss which you may have suffered.

### **Secure Socket Layer (SSL)**

A Secure Socket Layer is a commonly used method of managing the security of messages transmitted across the Internet and is used by us to connect your computer/device to our secure servers. You can tell that SSL is in use when a small padlock icon appears on your browser address bar. If you have problems getting to secure mode, install one of the latest browsers and try the site again.

### **Which browser do I need to view this site?**

Our site has been designed to work with a variety of browsers on either Apple Macintosh computers or Windows based PCs. It will run on versions 9 and later of Microsoft Internet Explorer, as well as Chrome 30 and Firefox 27. If you are using an older browser, you will be able to view the information pages but you may not be able to access your information online. We recommend you upgrade to the latest versions if you are having problems.

### **Cookies**

Cookies are common and do not harm your system. Cookies are small text files placed on your computer, tablet or phone, which have been sent to you by a Web server; they simply store or gather site information such as operating system, language etc. It is essentially an identification card relating to you. Cookies help you do things online, like remembering your login details so you don't have to re-enter them when revisiting a site.

#### **We use cookies to:**

- Gather customer journey information across our sites.
- Ensure your privacy in our secure sites.
- Store log-in details for our secure sites.
- Store details of your marketing, product and business unit preferences to improve our targeting and enhance your journey through our sites.
- Evaluate our advertising and promotional effectiveness.

We use both our own and our Partner's cookies to support these activities. We don't use cookies to track people's internet use after leaving our sites and we don't use them to store personal information that others could read and understand. We will not sell or distribute cookie information without your prior consent.

You can disable cookies from your computer, tablet or phone by following the instructions at [www.allaboutcookies.org](http://www.allaboutcookies.org). However, if you do not accept incoming cookies then the performance of our websites may degrade, and in some cases you may not be able to use them at all.

### **Phishing**

You may receive an email claiming to be from us, IDT or our Partner with a link to what appears to be one of our websites; where you may be prompted to enter your personal and/or security details. We are in no way involved with such emails, the website does not belong to us and you should not enter your details. If you are unsure, access our website by typing in the URL directly.

Do not reply to any such emails or disclose any personal information using the linked websites. If you think you have received a fraudulent email that looks like it is from us or IDT Financial Limited, please forward the entire email including the header and footer to [compliance@tuxedomoney.com](mailto:compliance@tuxedomoney.com) and then delete it from your email account.

**Contact Information**

**Email:** [compliance@tuxedomoney.com](mailto:compliance@tuxedomoney.com)

**Telephone:** 0871 220 6420

**Post:** Data Protection Enquiries, Data Protection & Compliance Officer, PO Box 3753, Chester, CH1 9UH

**Information Commissioner**

General information about data protection may be found at:

Information Commissioner's Website: <http://www.ico.gov.uk/>

Direct Marketing Association: [www.dma.org.uk](http://www.dma.org.uk)