

Compliance

## **Privacy Policy-Merchant Testing Platform**

2021-01-29

This Privacy Notice governs your Merchant Account and any information you provide to us.

Netcetera adheres to high standards of data protection of personal data collection and processing.

This Privacy Notice explains what information 3DS Testing Platform collect about its users and what we do with that information.

This Privacy Notice applies to the information that we obtain through your registration in 3DS Testing Platform via a device or when you otherwise interact with Netcetera.

In this notice, when we talk about personal data we mean any information that relates to an identifiable natural person.

If you wish to use the 3DS Testing Platform, you must accept all the provisions of this Privacy Notice. If you do not agree to any provision of this Privacy Notice, you will not be able to register or use the 3DS Testing Platform.

Please note that we may amend this Privacy Notice from time to time.

For the purpose of this Privacy Notice the controller of your personal data is:

**Netcetera**

Zypressenstrasse 71

P.O. Box

8040 Zürich

Switzerland

T +41 44 297 55 55

[info@netcetera.com](mailto:info@netcetera.com)

<https://www.netcetera.com>

**Privacy Contact:**

[privacy@netcetera.com](mailto:privacy@netcetera.com)

### **1. What types of personal data do we collect?**

Opening a Merchant Account - user account and using 3DS Testing Platform.

If you choose to open a Merchant Account on our Websites we will ask you to provide us with certain information about you. In particular, we may ask you to provide the following information:

- 2 Merchant identifiers (technical info)
- Email address
- Password

- Phone number
- First name
- Last name
- Address
- Country
- Company

Please note that without this personal data we may not be in a position to provide you with our service.

**Browsing Information:** IP address is anonymized, i.e. we cannot detect where you come from or associate your Netcetera web usage with any other data held by us.

**Newsletter/mailings:** e-mail address and sometimes name. [More information on newsletters and mailings.](#)

## 2. Cookies

3DS Testing Platform uses only necessary cookies. We do not use cookies to identify and track the users.

## 3. Marketing automation

The 3DS Testing Platform website and its related services use Pardot. Pardot is a software as a service (SaaS) marketing automation platform by Salesforce offering email automation, targeted email campaigns and lead management for B2B sales and marketing organizations. Pardot automates common marketing tasks, including: tracking customer behaviors, creating digital marketing campaigns, web form management, website tracking, social marketing, landing page marketing, creating reports to track performance, lead generation, personalization of landing page content for the current viewer.

Learn more about Pardot <https://www.pardot.com/>

Pardot uses cookies to help the website analyze how users use the website. The information generated by the cookie about your use of the website will be transmitted to and stored by Pardot for use of Netcetera. Such information is usually transferred to a server of Salesforce in the U.S. and stored there. For the cases in which personal data is transferred to the U.S., Salesforce has submitted to the EU-U.S. Privacy Shield Framework and to the Swiss-U.S. Privacy Shield Framework.

## 4. Website analytics

The 3DS Testing Platform website and its related services use Matomo. Matomo is an open source software tool for web analysis. Web analysis is the collection, collection and evaluation of data on the behaviour of visitors to Internet sites. Learn more about the [web analytics tool Matomo](#).

Matomo uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website will be transmitted to and stored by Netcetera.

If you do not want to be tracked, check the box below.

You may choose to prevent this website from aggregating and analyzing the actions you take here. Doing so will protect your privacy, but will also prevent the owner from learning from your actions and creating a better experience for you and other users.

You are not opted out. Uncheck this box to opt-out.

## 4.1. What is the purpose and the legal grounds for processing your personal data?

We always process your personal data for a specific purpose and only process the personal data relevant to achieve that purpose.

We process your personal data based on the following legal grounds for:

- performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract,
- based on your consent, voluntarily provided by you on the Site (e.g. when you create an account);
- compliance with a legal and regulatory obligations to which we are subject;
- the purposes of our legitimate interests.

We process your personal data for the following purposes:

- to verify your identity;
- providing technical and content-related support in the scope of using the Merchant Account;
- managing our relationship with you, including communicating with you in relation to our products and services (for example, when you register for an event);
- providing and improving our products and services;
- meeting our legal and regulatory obligations.

Netcetera does not collect, share or process your sensitive personal data (religious or political views, health related data etc.) in any manner.

## 4.2. Who do we share your personal data with?

Sometimes we share your personal data with third parties, including other companies or offices of Netcetera in connection with our business strategy and where necessary for us to provide you with our products and services.

We may share your personal data with Mastercard for troubleshoot issues. The following data will be shared: 2 Merchant identifiers (technical info), Email address and Company name. We also may share your personal data with Mastercard for Registration Report. The following data will be shared: Company name, Acquire BIN, Merchant ID and registration date & time. For details about the information we may share with Mastercard see Mastercard Global Privacy Policy <https://www.mastercard.us/en-us/vision/corp-responsibility/commitment-to-privacy/privacy.html>.

We also ask third party service providers to carry out certain business functions for us such as marketing service providers, consultants and accountants, and any prospective buyers of Netcetera and its related businesses. We take steps to ensure they meet our confidentiality and data security standards, so that your personal data remains secure.

We may disclose personal data to public authorities, regulators or governmental bodies when required by law or regulation or if an authority or governmental body has issued an order requesting such personal data from us. Before we provide the information, we will inform you if the applicable law allows us to do so.

We store and process your personal data on servers located within Switzerland and the European Economic Area (the "EEA"). Normally we do not transfer your personal data outside of Switzerland and/or the EEA. If special cases require a transfer of personal data outside of Switzerland and/or the EEA, such as to our location in North Macedonia, we only do so where (i) you have given us your consent, (ii) the country ensures an adequate level of protection for your personal data, (iii) we have put appropriate safeguards in place to protect your personal data or (iv) the transfer is permitted by applicable laws.

If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your personal data you can contact us at [privacy@netcetera.com](mailto:privacy@netcetera.com).

#### **4.3. How long do we keep your personal data?**

We only store personal data for as long as it is necessary to fulfill the purpose for which it was collected or to comply with legal or official requirements.

#### **4.4. How do we keep your personal data secure?**

We have in place appropriate technical and organisational measures to prevent unauthorised or unlawful access to the personal data you have provided to us. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means.

#### **4.5. What are your privacy rights and how can you exercise them?**

You have the right to:

- access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the persons to whom it is disclosed and the period for which it will be stored;
- require us to correct any inaccuracies in your personal data without undue delay;
- require us to erase your personal data;
- require us to restrict processing of your personal data;
- receive the personal data which you have provided to us, in a machine readable format

Please note that these rights are not absolute and are subject to certain exemptions under applicable data protection law.

If you have any questions or would like to exercise any of your rights please contact:[privacy@netcetera.com](mailto:privacy@netcetera.com).

If you are not satisfied with Netcetera's response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you believe an issue in relation to your data has arisen.