
Effective as of 02.11.2018

Privacy Notice of GFC

This Privacy Notice describes the rules according to which GFC Good Finance Company AS processes the personal data of any person using the GFC app and/or any person using any services offered by GFC.

1. GLOSSARY

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

GFC: GFC Good Finance Company AS (further GFC or we)

Card: payment card issued by GFC

Payment Account: payment account at GFC

Payment Account Terms: regulated under General Terms and Conditions available on the www.gfc.ee website

Policy: this Privacy Notice

Person (You): any person using the GFC app and/or any person using any services offered by GFC (incl user)

User: a person or an entity, who uses the Services, agreed to the Terms of Use and is a holder of an Account.

Data controller of personal data: GFC Good Finance Company AS, registry code 12423254, address Rotermanni 5, 10111 Tallinn, Estonia (incl data controllers authorized by GFC).

Data Protection Officer- The responsible person appointed by the GFC

2. THE PRINCIPLES OF PROCESSING PERSONAL DATA

GFC principles while processing Person's/ GFC user personal data:

- 2.1. GFC processes personal data only in accordance with this Policy and applicable laws;
- 2.2. GFC collects and processes personal data only for the purposes stipulated in this Policy;
- 2.3. GFC makes sure that the personal data which GFC collects and processes is:
 - 2.3.1. adequate, relevant and limited to what is necessary for the purposes stipulated in this Policy;
 - 2.3.2. accurate and up to date and
 - 2.3.3. stored only for such period as is necessary for the purposes stipulated in this Policy.

GFC applies appropriate technological and organizational measures to ensure the availability, authenticity, integrity and confidentiality of personal data.

3. THE PERSONAL DATA WE COLLECT

3.1. The personal data, which gfc collects and processes includes the following:

3.1.1. Personal Details – Your personal details, including:

- Full name;
- Date of birth;
- Personal identification code;
- Citizenship;
- Residency;
- Residential address;
- e-mail address;
- mobile phone number;
- occupation, photo of person, which is provided to GFC for the purpose of identifying the person.

3.1.2. Identification Document Data – Data retrieved from Person's identification document which Person has forwarded to GFC, including the document number, issue date, expiry date and issuing entity, photo of Person's identification document, which Person has forwarded GFC for the purpose of identifying itself.

3.1.3. Due Diligence Data – Data which GFC collects for the purpose of conducting customer due diligence under applicable anti-money laundering laws from Person and appropriate databases, including information about:

3.1.3.1. whether Person have been affiliated with money laundering or terrorist financing;

3.1.3.2. whether Person have been prosecuted for a crime;

3.1.3.3. whether Person have been subject to any international financial sanctions;

3.1.3.4. whether Person have (been) held a public office or

3.1.3.5. whether the Person is/ have been a close relative or associate of someone who has held public office.

3.1.4. Transaction Data – Details of any transfers made to and from Person's Payment Account, including the name and account number of the payer and the payee, the date, time, currency, amount and explanation of the transaction.

3.1.5. Card Data – Person's Card data, including:

3.1.5.1. Card number of the Person;

3.1.5.2. the name printed on Person's Card;

3.1.5.3. the expiry date of Person's Card;

3.1.6. Device Data – Information regarding the device/i-GFC on which Person is using the GFC app/ i-GFC, including the device's model, name or any other identifier and the IP address of the network from which Person is using the GFC app/i-GFC.

3.1.7. Preference Data – Person's preferences in the GFC app/i-GFC (language preferences, transaction limits, etc).

3.1.8. Contact Data – The contacts list on Person's device.

3.1.9. Customer Support Data – Communication between Person and GFC's customer support (e-mails and calls).

3.1.10. Usage Data – Data about Person interaction with the GFC app/ i-GFC (e.g. information about which features of the GFC app/-i-GFC does Person use, which features do not use, etc).

3.1.11. Other Data – Other data not listed in this Section 3.1, which is generated as a result of using the GFC app/i-GFC (e.g. gif-images added to payments, comments added to claims, etc).

4. GROUNDS FOR COLLECTING AND PROCESSING PERSONAL DATA

4.1. GFC collects and processes personal data for the following purposes:

- 4.1.1. Compliance purposes (GDPR art 6 (1) (a)) – to perform an obligation under applicable laws, including the obligation to:
 - avoid money laundering, terrorist financing and fraud;
 - ensure the fulfilment of international financial sanctions;
 - ensure the security of GFC’s payment services;
 - comply with the lawful inquiries and orders of:
 - public authorities, including foreign public authorities with whom GFC is obliged to cooperate under applicable laws;
 - other financial institutions with whom GFC is obliged to cooperate under applicable laws.
- 4.1.2. Contractual purposes (GDPR art 6 (1) (b)) – to perform or enter into a contract between Person and GFC.
- 4.1.3. Fraud monitoring purposes (GDPR art 6 (1) (f)) – to monitor and decrease payment fraud.
- 4.1.4. Analytical purposes (GDPR art 6 (1) (f)) – to gain a better understanding of the preferences of GFC’s customers and how do customers interact with the GFC app/ i-GFC.

Note that upon processing personal data for Analytical Purposes, the data is part of a large mass of data. GFC does not analyse Person’s individual preferences or Person’s individual interaction with the GFC app/i-GFC.

- 4.1.5. Marketing Purposes (GDPR art 6 (1) (a)) – to send marketing e-mails of GFC’s products and services.

4.2. GFC does not process personal data for profiling or other automated decision making.

5. PURPOSE OF USING PERSONAL DATA

5.1. GFC processes the following data for the following purposes:

	Purpose					
	Compliance	Contractual	Fraud Monitoring	Analytical	Marketing (upon Person prior consent)	Additional Features
Personal Details	V	V	V	V	V	
Identification Document Data	V					
Device Data	V	V		V		
Transaction Data	V	V	V	V		
Preference Data		V		V		
Card Data		V				
Contact Data						V
Due Diligence Data	V					
Customer Support Data		V		V		
Usage Data				V		
Other Data		V				

6. PERSON’S CONSENT ON OPERATIONS FOR DATA PROCESSING

6.1. GFC needs Person’s consent for processing personal data for the following purposes:

- 6.1.1. Marketing purposes;
- 6.1.2. Additional Features.

6.2. GFC does not process personal data for the purposes stipulated in Section 6.1 unless Person has granted GFC Person’s prior consent.

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6.3. If GFC would want to process personal data for any new purpose, which requires Person's consent, then GFC will not process personal data for such new purpose, before GFC has received Person's consent for such processing.

7. CONSENT ON WITHDRAWAL FOR PROCESSING PERSONAL DATA

7.1. The consent for the processing of personal data can be withdrawn at any time:

7.1.1. Data collected for marketing purposes:

- Send an email to dataprotection@gfc.ee to delete personal data for marketing purposes.

7.2. The withdrawal of Person's consent does not affect the legality of processing personal data prior to the withdrawal of Person's consent.

8. LEGISLATIVE RESPONSIBILITY TO DISTRIBUTE THE PERSONAL DATA TO GFC

- There is no statutory obligation for Person to provide GFC its personal data. However, there are statutory obligations for GFC to collect personal data.
- In order for GFC to provide Person its services, GFC needs to collect and process personal data. In case GFC is not able to collect or process personal data, GFC will not be able to provide Person its services.

9. OTHER SOURCES FOR COLLECTING PERSONAL DATA

GFC collects Due Diligence Data from sources other than Person itself. Such sources include:

- databases of people affiliated with money laundering or financing terrorism;
- databases of people, who have been accused of a crime;
- databases of people subject to international financial sanctions;
- databases of people who have held a public office, etc.

Some of these databases are publicly available and some of them are not. In addition, GFC uses other public databases for collecting Due Diligence Data.

10. TERMS FOR STORING AND KEEPING OF PERSONAL DATA

10.1. GFC stores personal data for the following periods:

10.1.1. Transaction Data – 7 years after Payment Account is closed. *GFC is obliged to store this data for such period under accounting and taxation laws.*

10.1.2. Personal Details, Identification Document Data, Due Diligence Data, Card Data – 5 years after termination of the business relationship with GFC, which, upon the request of the Estonian Financial Intelligence Unit may be extended up to another 5 years. *GFC is obliged to store this data for such period under Money Laundering and Terrorist Financing Prevention Act.*

10.1.3. Device Data, Preference Data, Contact Data – Until the closure of Payment Account (for Payment Account and GFC app/ i-GFC to function).

10.1.4. Customer Support Data, Usage Data – 1 year as of its creation, except for e-mails and chat logs, which are stored at least until the closure of Payment Account.

GFC stores this data for such period as within this period the data is still relevant for Analytical Purposes. E-mails and chat logs are necessary for providing customer support until such time when Person is no longer a customer of GFC.

10.1.5. Other Data – Deleted after closing Payment Account. *This data is necessary only for enabling Person the use of the GFC app/i-GFC and is not necessary after Payment Account is closed.*

10.2. After the periods stipulated in this Section 10.1 GFC will delete personal data.

10.3. GFC stores personal data on servers/cloud located within the European Economic Area.

11. PERSON RIGHTS IN CONNECTION WITH PERSONAL DATA

11.1. In connection with the processing of personal data, person has the following rights:

11.1.1. Right to information – Person has the right to receive the information provided in this Policy. The valid version of this Policy will be available on the www.gfc.ee website at any given time.

11.1.2. Right to access – Person has the right to ask GFC to provide Person with a copy of its personal data which GFC processes.

11.1.3. Right to Rectification – Person has the right to ask GFC to rectify Person's personal data in case the data is incorrect or incomplete.

11.1.4. Right to erasure – Person has the right to ask GFC to erase Person's personal data, unless GFC is obliged to continue processing personal data under law or under a contract between Person and GFC, or in case GFC has other lawful grounds for the continued processing of Person's personal data. In accordance with Section 10, GFC will, in any case, delete personal data as soon as it no longer has lawful grounds for processing Person's personal data.

11.1.5. Right to restriction – Person has the right to ask GFC to restrict the processing of Person's personal data in case the data is incorrect or incomplete or in case Person's personal data is processed unlawfully.

11.1.6. Right to data portability- Person has the right to ask GFC to provide Person or, in case it is technically feasible, a third party, personal data, which Person itself has provided GFC and which is processed in accordance with Person consent or a contract between Person and GFC.

11.1.7. Right to object – Person has the right to object to processing personal data in case Person believe that GFC has no lawful grounds for processing Person's personal data. For any processing conducted in accordance with Person consent, Person can always withdraw its consent by following the instructions set out in Section 7.

11.1.8. Right to file complaints – Person has the right to file complaints regarding Processing personal data as further described in Section 18.

11.2. Person can exercise its rights stipulated in this Section 11 by using the respective functionalities of the GFC app/ via i-GFC or sending a respective request to dataprotection@gfc.ee.

11.3. GFC will make its best efforts to respond to Your application submitted in accordance with this Section 11 within 2 weeks. Under GDPR art 12 (3) GFC must respond to Your application within 1 month. In case it is necessary due to the number and complexity of applications filed with GFC, GFC may, under GDPR art 12 (3), also respond to Your application within 3 months.

12. PROCESSING PERSONAL DATA REGARDING CHILD ACCOUNT

12.1. GFC does not open Child Account as according to GFC Terms and Conditions it can be opened by a person with an active legal capacity of at least 18 years of age.

13. DISTRIBUTION OF PERSONAL DATA

13.1. Upon processing personal data, GFC may share elements of Person's personal data with the following third parties:

- 13.1.1.** public authorities and other financial institutions whom GFC is obliged to disclose personal data under law;
- 13.1.2.** server hosts/ cloud service providers who host GFC's servers/ clouds;
- 13.1.3.** payment processors and payment network operators who process Person's transactions;
- 13.1.4.** identification service providers who help GFC verify Person's identity and acquire Due Diligence Data;
- 13.1.5.** card manufacturers who manufacture Person's Card;
- 13.1.6.** communication service providers who facilitate e-mails, calls, SMS messages and other communication between Person and GFC;
- 13.1.7.** couriers who help GFC deliver letters (e.g. letters with Your Card and PIN codes);
- 13.1.8.** partners, with whom GFC has arranged You a gift, a discount or another special offer;
- 13.1.9.** other parties involved with the provision of GFC's services.

13.2. The partners listed in Section 13.1 above may be located within and outside of the European Economic Area but GFC makes sure that the servers on which personal data is stored are, in any case, located within the European Economic Area.

14. SHARING PERSONAL DATA WITH THIRD PARTIES AND SAFEGUARDING MEASURES APPLIED

14.1. Upon sharing personal data with third parties, GFC will apply the following safeguards (except as specified in Section 14.2):

- 14.1.1.** GFC enters into a data processing agreement with the relevant third party;
- 14.1.2.** GFC makes sure that such third party undertakes to implement appropriate technical and organizational measures ensuring the processing of personal data in accordance with this Policy and applicable laws;
- 14.1.3.** GFC makes sure that personal data will not be forwarded to any countries which the Commission of the European Union has not recognized as ensuring an adequate level of data protection.

14.2. GFC cannot apply the safeguards stipulated in Section 14.1 above upon sharing personal data with public authorities and other financial institutions whom GFC is obliged to disclose personal data under law.

15. AMENDMENT OF THE PRIVACY POLICY

GFC may unilaterally amend this Policy from time to time. Upon amending this Policy, GFC will notify person about the new Policy by e-mail and/or via the GFC app/i-GFC. In case the new Policy refers to processing personal data for any new purpose, which requires Person's consent, then GFC will not process personal data for such new purpose, before it has Your consent for processing Your personal data for such new purpose.

16. INQUIRIES, REQUESTS AND COMPLAINTS

16.1. In case You have inquiries, requests or complaints regarding the processing of Your personal data, You may forward them to:

- +372 6290052
- dataprotection@gfc.ee

which are processed by the Data Protection Officer of GFC - [Andrii Danchak](#).

16.2. In case You have complaints regarding the processing of Your personal data, You may file them with the Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon) or the Data Protection Authority of the state in which You have permanent residence.

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