

# Privacy Policy

Version en 2020

This policy sets out the data protection practices of ClickandBuy International Limited (“**ClickandBuy**”, “**we**” and “**us**”) for our website [www.clickandbuy.com](http://www.clickandbuy.com) and products that were offered up until 30.04.2016. For legal reasons we may continue to process your data after our products and services are terminated. Please take the time to review this policy carefully.

By using this site and by having registered for a ClickandBuy account, you consent to the collection and use of personal information in accordance with this privacy policy.

Periodic changes may need to be made to this policy. Any future changes will be added to this policy. Please note that we are not responsible for the privacy policies and practices of other sites, even if you access them using links from this site. We recommend that you review the policy of each site that you visit.

## **Which personal data do we store and how do we use it?**

As part of the ClickandBuy registration process that was available up until 30.04.2016, we collected the following personal information: name, date of birth, address, email address, telephone number, bank account information and/or credit card information. During the processing of payment transactions up until 30.04.2016, we received information about the products and services of any third party service provider (“**Provider**”) you purchased from, using your ClickandBuy account. We continue to store these details to provide an overview of all payment transactions made by you. In addition, personal information is stored if it is provided by you voluntarily, e.g. if you send us an enquiry.

For the purposes of the prevention and detection of fraud and any other payment related issues, as well as local regulatory restrictions, it is necessary to collect information when you administer your ClickandBuy account and when processing payment transactions. We collect the following information: the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

ClickandBuy International Limited, in compliance with the Money Laundering Regulations 2007, is obliged to retain personal data that verifies the customer identity as well as transactional data for anti-money laundering purposes for a period of five years after the termination of the business relationship.

The personal data you have provided, through either an enquiry or through the day to day use of our services, up until 30.04.2016, can be used for processing a redemption of e-money or reversing a payment transaction that was undertaken before 01.05.2016.

Please note that if you request to redeem e-money after 30.04.2016, ClickandBuy, in the interests of the detection and prevention of financial crime, may ask you to supply further personal data in order to process any transaction securely. For example, we may ask you to provide a copy of your ID, a credit card statement or a utility bill in order to verify your address.

If necessary, your personal data is passed to:

- **Providers** if you complain about their products or services purchased before 01.05.2016. You also agree to give the Provider this data if any payment to the Provider cannot be successfully processed or if subsequent processing is necessary;
- **agents or contractors** who assist us in providing the services we offer through the site. We have the undertaking from our agents and contractors that they will only use your information to the extent necessary to perform their support functions;
- **governmental and/or regulatory institutions and authorities** only if we are legally entitled or obliged to do so (for example if required by a court or for the purpose of the prevention of money laundering, fraud or other crime);
- **third parties** as part of the reorganisation or a sale of the assets of ClickandBuy.

Other than the above, no information will be passed to any other third parties during the period for which we are obliged to retain your personal data.

During our previous work with the credit reference agency, Creditreform Boniversum GmbH, where necessary we passed personal data to this agency to assess your overall creditworthiness. Requests for right of access to the personal data held by Creditreform Boniversum GmbH can be sent to the following address: Creditreform Boniversum GmbH, Hellersbergstraße 11, 41460 Neuss, Germany.

If your personal data is processed outside of the European Economic Area (“EEA”), we ensure that your personal data continues to be protected.

Your data will be deleted when it is no longer necessary for the above mentioned purposes, unless it must be kept for legal reasons.

ClickandBuy does not use cookies on the website [www.clickandbuy.com](http://www.clickandbuy.com).

All personal data is collected, processed, stored and used in accordance with the provisions of the Data Protection Act 2018.

## **Your rights**

You have a statutory right under the Data Protection Act 2018 to obtain a copy of all the personal information about you, held by us. Upon request, we will provide you with a copy of this information. You also have the right to correct any errors in the information we hold on you.

## **Contacting us**

If at any time you would like to contact us with any enquiry relating to your personal information, you can do so by sending an email to us at [service@clickandbuy.com](mailto:service@clickandbuy.com).