

Viseca Card Services SA Data Protection Policy (“Viseca General Data Protection Policy”)

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1. General

Viseca Card Services SA (hereinafter "**Viseca**") receives various information from the holders of payment cards (credit, prepaid or debit cards and combined cards with credit and debit function or prepaid and debit function issued by Viseca; hereinafter "**Cardholders**" and "**Card(s)**") and from other sources for the provision of its services. Data protection and transparency about the data processing it carries out are very important for Viseca. Viseca assumes all responsibility for ensuring optimal data protection and thereby compliance with the Data Protection Act. It therefore takes various measures such as implementing technical and organisational security measures, making employees aware of the relevant issues and training them accordingly and appointing a data protection officer.

The purpose of this data protection policy is to clearly set out the essential data processing activities which Viseca takes in relation to the personal data of Cardholders. There are separate data protection policies for data processing at VisecaOne and the surprise rewards programme, available at www.viseca.ch/en/data-protection/visecaone and www.surprise.ch/datenschutz. The current [General Terms & Conditions of Viseca \(GTC\)](#) are legally binding for contractual relationships between Cardholders and Viseca.

2. Basis

Depending on the product, Viseca relies, in particular, on Section 10 of the [Conditions for the Use of Credit and Prepaid Cards](#) issued by Viseca Card Services SA, incl. the rewards programme (hereinafter "**Viseca Credit/Prepaid GTC**"), on Section 7 of the [Conditions for the Use of Payment Cards](#) issued by Viseca Card Services SA (hereinafter "**Viseca Payment Cards GTC**"; or where the Viseca Credit / Prepaid GTC and the Viseca Payment Cards GTC are mentioned together: "**Viseca Private GTC**") and on Section 8 of the Conditions for the Use of Business and Corporate Cards issued by Viseca Card Services SA ("**Viseca Business Customers GTC**"; when Viseca Private GTC and Viseca Business Customers GTC are mentioned together: "**Viseca Cards GTC**"). Additional conditions apply to the use of other Viseca services or when visiting Viseca websites. Both the Viseca Cards GTC and its data protection provisions as well as provisions for further services such as the [online services](#) (hereinafter "**Services**") are notified to the Cardholder upon application for and conclusion of a Card agreement or in the context of the use of the respective Services and accepted by the latter.

3. Data collection by Viseca

Viseca collects the following data:

- Personal information which is provided to Viseca in the context of the application for a Card or during the period of the Card relationship (i. e. in connection with invoicing, refunds or collecting outstanding claims and processing insurance claims) or which it collects itself (customer and card data);
- Transaction data from the use of the Cards (data relating to purchase or cash withdrawal details). For more information about transaction data, please see the paragraph "Information content of transaction data";
- Personal information of the Cardholder participating in the surprise rewards programme, provided when registering for the rewards programme or during participation in the rewards programme via the surprise website or during use of the surprise mobile app (cf. separate data protection policy at www.surprise.ch/datenschutz);
- Data collected during the use of the Card for online payments such as the Internet connection (IP address), the devices used or additional authentication measures performed by the Cardholder (cf. the following paragraph "Data processing when performing the Card agreement");
- Personal information of the main Cardholder and holders of additional Cards disclosed to Viseca when the services offered on VisecaOne are used or which are collected by Viseca itself (cf. separate data protection policy at www.viseca.ch/data-protection/visecaone);
- Data relating to usage behaviour (i. e. IP address, access date, usage) on the Viseca websites www.viseca.ch, one.viseca.ch, www.flexcard.ch, www.debit-card.ch, www.surprise.ch, www.mycard.ch, www.kontaktlos.ch, in the VisecaOne app as well as other Services of Viseca according to the conditions of use of the corresponding websites and/or Services (cf. the following paragraph "Data processing on Viseca websites and when providing other Services");
- Data of third parties (e.g. mediating banks, the Centre for Credit Information (ZEK) and the Centre for Consumer Credit Information (IKO), authorities, credit agencies, employers, other Aduno Group companies, publicly accessible databases or registers such as local.ch or the commercial register) within the context of the relevant purpose.

4. Information content of transaction data

When Cards are used, Viseca receives individual transaction data (data relating to purchase and cash withdrawal details). This includes the following information in particular:

- Card acceptance point (where was the purchase made?),
- transaction amount (how much did the purchase cost?)
- time of the transaction (when was the purchase made?),
- additional data such as the mode of Card use (i. e. online, contactless) or the number of incorrect PIN entry attempts, selected currency.

Only for certain transactions, such as the purchase of flight tickets and – in the case of participation in the surprize rewards programme – the acquisition of prizes on the surprize website, this information is more detailed. Viseca therefore only has access to the content of the shopping basket (what was purchased?) in very few exceptional cases and is generally unable to see what was actually purchased.

5. Data processing when performing the card agreement

The transaction data are transmitted to Viseca by the card acceptance points (merchants or Bancomat) when the Card is used. **This transmission generally takes place via the global networks of the international card organisations Mastercard and Visa** (cf. the [Mastercard](#) global data protection statement and/or the information from [Visa](#)). The transactions are then verified and authorised by Viseca and invoiced to the Cardholder. In the case of cash withdrawals at domestic Bancomats using a card with debit function or a credit card that is authorised for use at Bancomats to make direct withdrawals from the bank account, the transfer is by direct debit (direct withdrawal from the cardholder's corresponding bank account).

When authorising the transactions, Viseca checks whether the transaction is carried out by the entitled Cardholder or whether it could be a fraudulent transaction. Since Viseca bears the financial risk of losses arising from fraudulent transactions, it takes various measures to **prevent fraud** at its own discretion. Each transaction is automatically compared against predefined rules and conditions in order to detect possible indications of misuse. In addition, the transactions are checked for significant deviations from usual Card usage (i. e. in terms of time or location) where possible. If Viseca detects signs of possible Card misuse, it takes measures to prevent it. It may, for example, ask the Cardholder to provide additional means of identification or refuse to authorise the transaction. Despite these measures, misuse of the Card cannot be ruled out and these measures therefore do not release the Cardholder from the obligation to comply with his contractual duties of due care (cf. section 3 of [Viseca Cards GTC](#)).

If a secure payment method for the Card is used in an online shop (3-D Secure), Viseca collects and checks further data. The Cardholder is also prompted to confirm the payment (cf. the separate [terms and condition for use of VisecaOne](#) (GTC) and the [Data protection policy of Viseca Card Services SA for VisecaOne](#)).

Cardholders' data will also be processed during the processing of transaction complaints and chargebacks, e. g. to clarify unknown transactions or in the event of unjustified transactions. In this process, transactions are examined in depth and necessary measures are taken. Data are also collected and processed to settle insurance claims, in order to clarify the claims in cooperation with the insurance partner (cf. the [General Insurance Conditions GCI](#)).

Viseca also processes Cardholders' data in the context of its obligations to combat money laundering and the financing of terrorism particularly to identify the Cardholder or to determine the beneficial owners of assets.

6. Data processing for risk assessment and marketing purposes

Viseca processes the collected data for risk assessment purposes in order to determine the risks (e.g. credit and market risks) related to the issuing of Cards (cf. Section 10.2 Viseca Credit / Prepaid GTC and Section 7.3 Viseca Payment Cards GTC and 8.2 Viseca Business Customers GTC). This is, in particular, required because it bears the financial risk arising from the contractual relationship with the Cardholder (creditworthiness risk). **For this purpose it compiles individual risk profiles, which are, for example, used to assess creditworthiness.** It is not possible to revoke the authorisation to process data for risk assessment purposes, as Viseca must always be able to calculate and limit its financial risk. The revoking of this data processing is only possible by terminating the card agreement.

Based on the credit or prepaid transactions data collected or the debit transactions data collected in the case of combined cards with debit function, Viseca may also create customer, consumption and preference profiles for marketing purposes, which allow it to develop and offer products and services, which may be of interest to the Cardholders (cf. Section 10.2 Viseca Credit / Prepaid GTC and Section 7.4 Viseca Payment Cards GTC or 8.2 Viseca Business Customers GTC). Viseca may provide

the Cardholder with information about its own products and services or products and services of its partners via the available channels of communication (e. g. post, e-mail, push messages). **Each Cardholder has the possibility to revoke the consent to receiving marketing information (advertising block) or generally revoke the consent to process data for marketing purposes (by submitting a written notification (including by e-mail) to Viseca.**

In the case of cards with solely debit function Viseca can produce and evaluate customer, consumption and preference profiles from the debit transactions data collected in order to develop and evaluate products and services exclusively in connection with the debit function and to offer such products and services to the cardholder and provide to the cardholder information on these by post, email or otherwise (cf. Section 7.4 Viseca Payment Cards GTC). The cardholder may revoke consent to this at any time.

7. Data processing for contactless payments / Alternative card product

Viseca's products are equipped with contactless payment functionality. This operates via a radio frequency identification (RFID) chip integrated into the Card and equipped with an antenna. This antenna uses near field communication (NFC) technology to exchange information between the payment terminal and the Card. This chip stores the 16-digit card number, the expiry date and other data (card data) required to process a transaction. The chip on currently issued Cards also records the time and amount of the ten most recent transactions made with the Card, regardless of whether they were made using the contactless function or not and of whether the PIN had to be entered or not. The name and surname of the Cardholder are not stored on the RFID chip itself, but rather on the magnetic strip of the card, with the exception of Visa Cards issued before 28 April 2014.

Contactless Cards are subject to high security requirements and there are various protective measures to prevent misuse. It is, however, possible for card data and (in the case of Mastercard Cards) data relating to the last ten transactions made with the Card to be read out without the Cardholder's knowledge using a suitable device and corresponding software. The Cardholder's name and surname, however, cannot be read from Mastercard Cards and more recently issued Visa Cards.

If the reading out of this data leads to misuse of the Card by third parties leading to a financial damage, Viseca will bear full responsibility for the damage on the condition of the Cardholder fulfilling his duties of due care. Further information about contactless payments and the security aspects as well as duties of due care are available in the [FAQ](#) and at www.kontaktlos.ch.

Viseca offers an **alternative** for customers who would like to forego the use of contactless payments based on their assessment of the risk, despite the advantages of this function. The customer may apply for a credit card without the contactless payment function. The corresponding **application form** can be downloaded [here](#).

8. Data processing on Viseca websites and when providing other Services

Detailed information about which data are collected and processed during use of the Viseca websites (e. g. recording of user behaviour using cookies, the use of social media plug-ins and the possibility of deactivating them) or the usage of the Services is included in the relevant conditions of use of the Viseca websites (cf. conditions of use at: www.viseca.ch / one.viseca.ch / www.flexcard.ch / www.debit-card.ch / www.surprize.ch / www.mycard.ch / www.kontaktlos.ch) as well as in the [Conditions of Use for VisecaOne](#) and the [Data protection policy of Viseca Card Services SA for VisecaOne](#), and the [Conditions of Use for the online service "eXpense"](#) (for business cards).

The "Smart Data OnLine" service is available to display the transactions and invoices of holders of corporate cards. This is a service of Mastercard International. Registration for this service takes place directly on the "Smart Data OnLine" website. The information provided by Viseca for this service is processed and stored by Mastercard outside of Switzerland, particularly the United States. The legal provisions and the global [SmartData data protection statement of Mastercard](#) apply for the use of "Smart Data OnLine".

The [FAQs](#) on the Viseca website also include extensive information about online security and recommended user behaviour in connection with the websites and tips for the secure use of the Services.

9. Data security

Viseca has implemented suitable technical and organisational measures to ensure the security of the data which are collected and processed in order to protect them from unauthorised access, misuse, loss, falsification or destruction. Only persons who require the data to carry out their tasks are allowed to access the data.

Viseca uses globally accepted security encryption for the transfer of information via the website and in areas, which are only accessible after entering a specific log-in (e. g. VisecaOne). These can be recognised by the fact that the address starts with "https:".

10. Communication, sending of information and advertising

Viseca may send information and advertising to Cardholders by post or electronically (e-mail, push message, SMS, via VisecaOne (website or app) or by any other suitable means (cf. Section 10.2 and 11 Viseca Credit / Prepaid GTC and Section 7.4 and 8 Viseca Payment Cards GTC and Section 8.2 and 9 Viseca Business Customers GTC). This electronic communication with the Cardholder takes place via public communications networks. Data transmitted in this way is generally accessible to third parties, may be lost during transmission or may be intercepted by unauthorised third parties. It therefore cannot be ruled out that third parties might gain access to communication with the Cardholder despite all security measures taken.

Contact via email will only take place if Viseca received the sender's email address when the latter contacted Viseca or because it was stated in the Card application, entered in the application form or was provided when registering for a Service or newsletter or when participating in competitions.

Since email is an open form of communication, it is fundamentally unsuitable for transmitting personal information such as Card data. Viseca will only accept a client order via email if the execution of this order does not involve any risk to the Cardholder. Viseca will also only request that the Cardholder enter personal information on websites in defined exceptional cases. Detailed information about contact by Viseca, phishing and online security in general can be found in the [FAQs](#) on Viseca's website.

The sending of information and advertising by Viseca can, as long as they are not required to process the Card agreement, be waived at any time by declaring this to Viseca (i. e. advertising block/email block/contact block). Detailed information can be found in the paragraph "Data processing for risk assessment and marketing purposes" above and can be requested from Viseca's Customer Care Center at: +41 (0)58 958 84 00 / info@viseca.ch / or in writing from Viseca Card Services SA, Post Box 7007, Hagenholzstrasse 56, CH-8050 Zurich.

11. Data processing by third-party service providers / data transmission to third countries

To provide its services, Viseca works with third-party service providers both domestically and abroad. These third-party service providers are allowed to only process the data provided by Viseca in the interests of and for the purposes defined by Viseca. They are subject to the same obligations relating to data protection and data security as Viseca itself and are obliged to keep the data secret.

Also when processing transactions via the international card networks of Mastercard / Visa, when communicating by electronic means and transmitting data, these data may in certain circumstances be communicated via or stored in third countries that do not offer the same level of data protection as Switzerland (e. g. the USA). We therefore point out that data transferred abroad may in certain circumstances not enjoy the same protection as that provided under Swiss law and access to this data by government authorities cannot be ruled out.

12. Forwarding of data

12.1. Customer and card data, cumulative turnover figures and transaction data

In connection with cards to which the Viseca Credit / Prepaid GTC respectively the Viseca Business Customers GTC apply, Viseca does not pass any data to third parties for the said parties' own purposes. Any exceptions to this rule require the authorisation of the Cardholder. According to Section 10.1 Viseca Credit / Prepaid GTC and 8.1 Viseca Business Customers GTC, client and card data as well as cumulative turnover figures may be provided to intermediary banks and companies in the Aduno Group. Under no circumstances will Viseca pass on individual transaction data or individual customer profiles to third parties for their own purposes without the prior express consent of the cardholder. Such express consent is obtained, for example, when transaction data is transmitted to the e-banking solutions of distributing banks (e. g. in connection with personal finance management solutions / digital financial wizards).

In connection with cards to which the **Viseca Payment Cards GTC** apply (debit, credit and prepaid cards or combined cards with credit and debit function or prepaid and debit function), **Viseca passes to intermediary banks** in accordance with Section 7.2 Viseca Payment Cards GTC customer and card data as well as cumulative turnover figures together with **transaction data** (depending on product version credit or prepaid and / or debit transaction data). From the transaction data can be drawn as necessary extensive conclusions as to the behaviour of the cardholder (e. g. residence and place of work, state of health, financial circumstances, leisure habits, social behaviour and further details). The cardholder may at any time withdraw consent to the disclosure of credit or prepaid transaction data to the intermediary bank with effect for the future without giving reasons. In the case of cards with solely debit function or combined cards with credit and debit function or prepaid and debit function **the transmission of the debit transaction data to the bank is obligatory in order to provide the service.**

12.2. Creditworthiness information

Within the scope of its obligations Viseca discloses creditworthiness information to the EK or IKO (cf. Section 10.1 Viseca Credit/Prepaid GTC and Section 7.1 Viseca Payment Cards GTC or 8.1 Viseca Business Customers GTC).

Data may also be forwarded to third parties when using Services, for example, when using MasterPass (cf. the separate [Data protection policy of Viseca Card Services SA for VisecaOne](#)).

Data from Cardholders of additional Cards may be provided to the primary Cardholder (cf. Section 1.1 Viseca Credit/Prepaid GTC). In the case of business or corporate Cards, Viseca discloses the Cardholder's data to the company (cf. Section 8.1 Viseca Business Customers GTC). Viseca may also disclose the Cardholder's data to persons individually authorised by the latter.

In the case of official orders or on the basis of legal obligations, Viseca will also provide Cardholder data to government offices and criminal or supervisory authorities.

13. Storage and deletion of the data

The Cardholder's data are stored by Viseca and suitably protected against unauthorised access. Data which are required as evidence for business accounts are deleted at the earliest at the end of the legally required or contractually agreed storage periods.

14. Right of information / Data correction

Each person has the right to receive information about the processing of their personal data by Viseca and to ask for correction or deletion of any incorrect data. Requests for information or correction and deletion must be addressed in writing along with a copy of a valid ID document (e.g. ID card, passport) to: Viseca Card Services SA, Post Box 7007, Hagenholzstr. 56, CH-8050 Zurich. Sample letters for asserting the right of information can be obtained on the homepage of the Federal Data Protection and Information Commissioner (FDPIC): [Link](#)

15. Questions / Contact

Questions or communications on the subject of data protection and data processing can be addressed to Viseca by telephone (+41 58 958 84 00), by email (privacy@viseca.ch) or in writing (Viseca Card Services SA, Datenschutz, Hagenholzstrasse 56, CH-8050 Zurich).

16. FAQ and special conditions

Further information on data protection can be found in the [terms and conditions for use of VisecaOne](#) and in the [Data protection policy of Viseca Card Services SA for VisecaOne](#), the [Conditions of Use for Online Services](#), the [Conditions for SMS services](#), the [Special Conditions for Electronic Invoices](#), the [Conditions for 3D-Secure](#), the [Special Conditions for the "e-banking Connection"](#) (provided the cardholder's consent to the integration of certain credit card information in e-banking of the bank). The website www.surprise.ch/datenschutz and the FAQ at www.surprise.ch also provide additional information relating to data protection for the surprise rewards programme.

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