

## MEDIRECT BANK PLC

### PRIVACY NOTICE

MeDirect Bank (Malta) plc (C 34125) (the “**Bank**”, “**we**”, “**us**”, or “**our**”) and its affiliated entities respect your privacy and are wholly committed to protecting the confidentiality and security of your personal data.

This Privacy Notice (the “**Notice**”) is addressed to subscribers to the Epic Device Monthly Payment Scheme (the “**Scheme**”), such as yourself, offered by Epic Communications Limited (“**EPIC**”). To facilitate both its offer and continued provision, the rights arising out of your subscriber arrangement with EPIC have been assigned to the Bank, which will also entail sharing certain personal data relating to you, as outlined below. The Bank will process your personal data as a controller and accordingly, this Notice sets out the basis on which any personal data we collect about you will be processed by us.

It is important that you read this Notice together with any other privacy or fair processing notice we may provide on specific occasions when we are processing personal data about you so that you are fully aware of how and why we are using your personal data.

This Notice supplements the other notices and is not intended to override them.

#### 1. Important information and who we are

##### Controller

We are a controller of your personal data.

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this Notice, and for handling any data subject requests. If you have any questions or requests, including any requests to exercise your legal rights as a data subject, please contact our DPO using the details below.

##### Contact Details

<b>Full name of legal entity:</b>	<b>MeDirect Bank (Malta) plc</b>
<b>Name:</b>	<b>Data Protection Officer</b>
<b>Email address:</b>	<b><u><a href="mailto:dataprotection@medirect.com.mt">dataprotection@medirect.com.mt</a></u></b>
<b>Postal address:</b>	<b>Level 2, The Centre, Tigne Point, Sliema TPO 0001, Malta</b>

Please use the words “**Data Protection Matter**” in the subject line.

#### 2. The data we collect about you

During your subscription, we will receive and process the following personal data about you:

- **Full name**
- **Identification document number**
- **Nationality**
- **Full address and postal code**
- **Contact number**
- **Date of birth (if provided)**
- **E-mail address**
- **Your credit standing**
- **History of cooperation with Epic or other telecom companies shared by you with Epic**
- **Method of payment for the Scheme**

### 3. How we use your personal data

We have set out below the purposes for which we plan to use your personal data:

- to monitor and review the performance of the Scheme as well as ongoing repayments;
- for billing, invoice and internal record keeping purposes;
- to collect and recover money which is owed to us;
- to permit us to pursue available remedies or limit any damages that we may sustain; and
- for compliance with any applicable legal obligations.

We will mainly rely on **art. 6(1)(f)**, GDPR (legitimate interests) as our legal basis for processing this information. Where the context relates to a legal obligation, we will alternatively rely on **art. 6(1)(c)**, GDPR.

### 4. How we share your personal data

From time to time, we may **need** to share some of your personal data with:

- our third-party consultants, (sub-)contractors, suppliers or other service providers who may access your personal data when providing services to us (including IT support services). This includes information technology experts who design and host our Site, and general service companies. These are carefully selected to ensure that they meet high data protection and security standards. We only share data with them that is required for the services offered and we contractually bind them to keep any information we share with them as confidential and to process personal data only according to our instructions;
- auditors or contractors or other advisors auditing, assisting with or advising on any of our business purposes;
- our successors in title or third parties to whom we may choose to sell, transfer, or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, the new owners may use your personal data in the same way as set out in this Notice; and
- government bodies and law enforcement agencies and in response to other legal and regulatory requests or **by instruction from a court, tribunal or public authority**.

Where your **details** are provided to any other party in accordance with an express purpose, we will require them to be kept safe and secure your personal data and only use it for the intended purpose.

### 5. Duration of Processing

Unless a different timeframe has been specifically stated in this Policy, personal data will be retained for as long as is necessary for the purpose(s) for which we originally collected it or to resolve disputes, establish legal defence, conduct audits, pursue legitimate business purposes and enforce our contractual terms.

We may also retain information as required by applicable law.

Outside of exceptional cases, we normally apply the following retention periods: one year from repayment of all amounts due by you to us under the Scheme

## 6. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- *Request access to your personal data.*
- *Request correction (rectification) of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us at [dataprotection@medirect.com.mt](mailto:dataprotection@medirect.com.mt)

- **Access**: You have the right to obtain confirmation that your information is being processed and to obtain access to your information, e.g., by receiving a copy of it.
- **Rectification**: You have the right to have your information corrected if it is inaccurate or incomplete.
- **Erasure**: You have the right to request the deletion or removal of your information in certain circumstances. Please note that there may be circumstances where it is not possible to fulfil the request for your information to be deleted, e.g. if there is a legal reason to retain it.
- **Object**: You have the right to object to processing of your personal data where we are relying on a legitimate interest or those of a third party, and you want to object to that processing as you feel that it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for marketing purposes.
- **Restrict**: You have the right to request that the processing of your information is restricted in certain circumstances. Again, there may be cases where we are legally entitled to refuse such a request.
- **Data Portability**: You have the right to request the transfer of your personal data to you or to a third party. We will provide that personal data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdrawal**: You may withdraw your consent at any time where we are relying on consent to process your personal data. This will not however affect the lawfulness of any processing carried out before you withdrew your consent and any processing activities that are not based on your consent will remain unaffected. Once we have been made aware that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Kindly note that none of these data subject rights are absolute and must generally be weighed against our own legal obligations and legitimate interests. If a decision is taken to override your data subject request, you will be informed of this by our data protection team along with the reasons for our decision.

## 7. Conclusion

This Notice may be updated from time to time.

Please note that if our business, or any part of it, is sold or transferred at any time, the information we hold may form part of the assets transferred, although it will still only be used in accordance with this Notice.

We reserve the right, at our discretion, to change, add, or remove portions from this Notice at any time. Please read this Notice carefully and re-visit this page from time to time to review for changes.

## GLOSSARY

Set out below are key definitions of certain terms which appear in, and apply to, this Notice:

- **“data subjects”** means living, natural persons about whom we process personal data;
- **“data controller”** or **“controller”** means any entity or individual who determines the purposes for which, and the manner in which, any personal data is processed;
- **“data processor”** or **“processor”** means any entity or individual that processes data on our behalf and on our instructions (we being the data controller);
- **“GDPR”** means the General Data Protection Regulation (Regulation (EU) 2016/679);
- **“legitimate interest”** means our interest to conduct our business appropriately and responsibly, to protect its reputation, and to provide the best possible services. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests;
- **“personal data”** means data relating to a living individual (i.e., **natural person**) who can be identified from the data we possess about him or her. This includes, but is not limited to, your name and surname, address, date of birth, contact details. The term **“personal information”**, where and when used in this Notice, shall have the same meaning as personal data;
- **“processing”** means any activity or set of operations that involves use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties; and
- **“sensitive personal data”** includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life or his or her biometric data.