Tax Free Commuter – Privacy Policy

A. Introduction

1. The privacy of our website visitors is very important to us, and we are committed to safeguarding it. This policy explains what we will do with your personal information.

B. Collecting personal information

The following types of personal information may be collected, stored, and used:

1. information about your computer including your IP address, geographical location, browser type and version, and operating system;

2. information about your visits to and use of this website including the referral source, length of visit, page views, and website navigation paths;

3. information that you may enter when you register on our website - for example, your company name, first name, last name, employee number, personal photo, email address, home address, and other details;

4. information that you enter while using the services on our website;

5. information that is generated while using our website, including when, how often, and under what circumstances you use it;

6. information relating to services you use, or transactions you make through our website, which includes your name, address, telephone number, email address, and commute details;

7. information contained in any communications that you send to us by email or through our website, including its communication content and metadata;

8. any other personal information that you send to us.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy

C. Using your personal information

Personal information submitted to us through our website will be used for the purposes specified in this policy or on other relevant pages of the website. We may use your personal information for the following:

- 1. administering our website and business;
- 2. personalizing our website for you;
- 3. enabling your use of the services available on our website;

- 4. sending you goods purchased through our website;
- 5. supplying services purchased through our website;
- 6. sending you non-marketing commercial communications;
- 7. sending you email notifications specific to the services that we are providing you;

8. providing third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);

- 9. dealing with inquiries and complaints made by or about you relating to our website;
- 10. keeping our website secure and prevent fraud;
- 11. verifying compliance with the terms and conditions governing the use of our website; and
- 12. other uses.

If you submit personal information on our website, we will supply that personal information to your employer to enable a decision on your application for the provision of our services.

We will not, without your express consent, supply your personal information to any third party for their or any other third party's direct marketing.

D. Disclosing personal information

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information:

- 1. to the extent that we are required to do so by law;
- 2. in connection with any ongoing or prospective legal proceedings;

3. in order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);

4. to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and

5. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this policy, we will not provide your personal information to third parties.

E. International data transfers

1. Information that we collect may be stored, processed in, and transferred between any of the countries in which we operate or maintain web server computers in order to enable us to use the information in accordance with this policy.

4. You expressly agree to the transfers of personal information described in this Section E.

F. Retaining personal information

1. This Section F sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations regarding the retention and deletion of personal information.

2. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

3. Without prejudice to article F-2, we will usually delete personal data falling within the categories set out below at the date/time set out below:

a. personal data type will be deleted after a period of inactivity of 5 years, being the period of time restriction applicable to certain of our services

4. Notwithstanding the other provisions of this Section F, we will retain documents (including electronic documents) containing personal data such as salary deduction documents:

a. to the extent that we are required to do so by law;

b. if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

c. in order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

G. Security of your personal information

1. We will take reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information.

2. We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

3. All electronic financial transactions entered into through our website will be protected by encryption technology.

4. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

5. You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

H. Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy. We may notify you of changes to this policy by email or through the private messaging system on our website.

I. Your rights

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity for this purpose, we will usually accept a photocopy of your passport certified by a notary plus an original copy of a utility bill showing your current address.

We may withhold personal information that you request to the extent permitted by law.

You may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

J. Third party websites

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

K. Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.