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# Privacy Policy for PayPal Services

Effective Date: Jan 06, 2016

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**Please note: The version of this Privacy Policy marked "Current Privacy Policy for PayPal Services" set out immediately below is effective until February 23, 2016. The version of this Privacy Policy marked "Updated Privacy Policy for PayPal Services" further below will take effect and supersede the Current Privacy Policy for PayPal Services on February 23, 2016.**

## Current Privacy Policy for PayPal Services

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Please view, read, [download and save](#) this Privacy Policy

This Privacy Policy governs your use of products, services, content, features, technologies or functions offered by PayPal and all related sites, applications, and services (collectively "PayPal Services") (including, without limitation, when you provide any information in relation to your use of PayPal Services).

You accept and consent to this Privacy Policy when you sign up for, access, or use the PayPal Services. **By accepting and consenting to this Privacy Policy, you expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy.**

## 1. Overview

In order to operate the PayPal Services and to reduce the risk of fraud, PayPal (Europe) S.à r.l. et Cie, S.C.A. ("PayPal", "our", "us" or "we"), the data controller, must ask you to provide us with information about yourself, including your credit or debit card and/or bank account details. By consenting to, and agreeing the terms of, this Privacy Policy, you expressly consent and agree to us processing your data in the manner set out herein. This Privacy Policy describes the information we collect and how we use that information. PayPal takes the processing of your information very seriously and will use your information only in accordance with the terms of this Privacy Policy. For the purposes of this Privacy Policy, the term "information" means any confidential and/or personally identifiable information or other information related to users of PayPal Services, including but not limited to customers and merchants (legal entities).

We will not sell or rent your information to third parties for their marketing purposes without your explicit consent. However, in order for us to offer PayPal Services to our users; enhance the quality of PayPal Services from time to time; and protect the interests of our users, we will in limited circumstances share some of your information with third parties under strict restrictions, as described in more detail in Sections 3, 5, and 6 of this Privacy Policy. It is important for you to review this Privacy Policy as it applies to all the PayPal Services.

This Privacy Policy is intended to govern the use of PayPal Services by our users (including, without limitation those who use the PayPal Services in the course of their trade or business) unless otherwise agreed through contract.

**Changes to this Privacy Policy:** All future changes to this Privacy Policy set out in the [Policy Update](#) already published on the "Legal Agreements" landing page of the PayPal website at the time you register for the PayPal Services are incorporated by reference into this Privacy Policy and will take effect as specified in the [Policy Update](#). "Policy Update" means a prior notice of changes to any of your agreements with PayPal which PayPal may make available to you in writing. If you disagree with the terms of this Privacy Policy, please do not register for or use the PayPal Services.

**Notification of Changes:** This Privacy Policy may be revised over time as new features are added to the PayPal Services or as we incorporate suggestions from our customers. We may change this Privacy Policy at any time by posting a revised version of it on our website. Unless we have legal grounds to do otherwise, we will provide you with at least 30 days' prior notice of the effective date of the revised privacy policy. We may post the notice on the "Policy Updates" page of our website(s) and/or send the notice by e-mail. As of the effective date of the revised privacy policy, you will be considered as having consented to all changes to the Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time.

Please check the PayPal website [here](#) on a regular basis for the most current version of our Privacy Policy.

**Third Party Websites:** Some pages on the PayPal website include links to third-party websites. These sites are governed by their own privacy statements, and PayPal is not responsible for their operations, including but not limited to their information practices. Users submitting information to or through these third-party websites should review the privacy statements of these sites before providing them with personally identifiable information.

**Not a Framework Contract:** For the avoidance of doubt, this Privacy Policy does not constitute a "framework contract" for the purpose of the EU Payment Services Directive (2007/64/EC) or any implementation of that directive in the European Union or EEA (including, without limitation, the UK Payment Services Regulations 2009).

**A Special Note about Children:** Children are not eligible to use PayPal Services and we ask that minors (persons under the age of 18) do not submit any personal information to us or use the PayPal Services.

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## 2. Information We Collect

**Required Information:** To open a PayPal account or use the PayPal Services, you must provide your name, address, phone number, and email address. In order to make payments through the PayPal Services, you must provide credit card, debit card or bank account information. We also ask you to choose two different security questions to answer (such as your city of birth or your pet's name).

We will also require other commercial and/or identification information if you send or receive certain high-value transactions or high overall payment volumes through the PayPal

Services or as is otherwise required in order for us to comply with our anti-money laundering obligations under European law.

**Using your device:** When you access PayPal using any device (whether connected to PayPal wirelessly or by a fixed line or otherwise), we may additionally collect and store device sign-on data (including device ID) and geolocation data in order to provide PayPal Services.

**Photographs:** If you use certain functionalities provided by us (including, without limitation, PayPal POS functionality on your mobile app) we may ask you to upload a picture of you in order to provide these specific services. Your face must be recognisable. Your image is solely your responsibility.

**Loyalty Information:** If we allow you to link your membership of an eligible loyalty scheme to your account, we may require you to provide to us your loyalty scheme membership ID.

**Transaction Information:** When you use the PayPal Services to send money to someone else or request money from someone else, we ask you to provide information related to that transaction. This information includes the amount and type of the transaction (purchase of goods, purchase of services, or simple money transfer), other purchase details and the email address, or phone number of the third party. Also, when you send money to another PayPal customer, you may be asked to provide personal details to that customer to complete the transaction. Those details may also be passed on to us from that customer. We also collect the Internet address (IP address) and other identifying information about the computer or device you use to access your PayPal account or use the PayPal Services, in order to help detect possible instances of unauthorised transactions.

**Information About You From Third Parties:** In order to protect all our customers against potential fraud, we verify the information you provide with [Payment Processors](#) and/or [Credit Reference and Fraud Agencies](#). In the course of such verification, we receive personally identifiable information about you from such services. In particular, if you register a credit card or debit card or bank account with PayPal, we will use card authorisation and fraud screening services to verify that your bank or card information and address match the information you supplied to PayPal, and that the card has not been reported as lost or stolen.

If you send or receive high overall payment volumes through the PayPal Services, or if as a merchant have limited selling history, in some circumstances we will conduct a background check on your business by obtaining information about you and your business, and potentially (if legally permitted) also about your directors, shareholders and partners, from a [credit reference or fraud agency](#). If you owe us money, we may conduct a credit check on you by obtaining additional information about you from a credit reference or fraud agency, to the extent permitted by law. PayPal, at its sole discretion, reserves the right to periodically retrieve and review a business and/or consumer credit report supplied by such credit reference or fraud agency for any account, and reserves the right to close an account based on information obtained during this credit review process.

If you use your PayPal account to sell items, we may also collect public information about your business and your behaviour on social media platforms (such as the e-mail address and the number of "likes" and "followers"), to the extent relevant to confirm an assessment of your transactions and/or your business, including its size and the size of its customer base.

**Information About You from Other Sources:** We may also collect information about you from other sources, including from members of PayPal's corporate family, other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole).

**Additional Verification:** If we cannot verify the information that you provide, or if you request a withdrawal by cheque to an address other than your verified credit card billing address, we may ask you to upload or send us additional information by fax (such as your driving licence, credit card statement, and/or a recent utility bill, or other information linking you to the applicable address), or to answer additional questions online to help verify your information.

**Website Traffic Information:** Because of the way Internet communication standards work, when you arrive at or leave the PayPal website, we automatically receive the web address of the site that you came from or are going to. We also collect information on which pages of our website you visit, IP addresses, the type of browser you use and the times you access our website.

**Cookies, Web Beacons, Local Storage and Similar Technologies:** When you access our website or use PayPal Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use Cookies to recognise you as a customer, customise PayPal Services, content and advertising, measure promotional effectiveness, help ensure that your account security is not compromised, mitigate risk and prevent fraud, and to promote trust and safety across our sites and PayPal Services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and PayPal Services.

For more detailed information on our use of these technologies, please see our policy on [Cookies, Web Beacons, and Similar Technologies](#).

**Communications:** When you communicate with us for customer service or other purposes (e.g., by emails, faxes, phone calls, tweets, etc.), we retain such information and our responses to you in the records of your account.

**Questionnaires, Surveys, Sweepstakes and Profile Data:** From time to time, we offer optional questionnaires, surveys and sweepstakes to our users for such purposes as collecting demographic information or assessing users' interests and needs. If we collect personally identifiable information from our users in these questionnaires, surveys, and sweepstakes, the users will be given notice of how the information will be used prior to their participation in the survey, questionnaire or sweepstakes.

**Individuals who are not Registered Users of PayPal Services and Requests:** When a registered user of the PayPal Services attempts to engage an individual who is not a registered user of the PayPal Services in a transaction (for instance, by sending a payment or other benefit to, or requesting a payment from that individual), we will retain the information that the registered user of the PayPal Services submits to us, including, for example, the other party's email address, phone number and/or name. Although this particular information is stored for a certain period of time in compliance with applicable law, we will not use it to market to the non-registered person. Additionally, these persons have the same rights to access and correct information about themselves (assuming that their details were correct) as anyone else who uses the PayPal Services.

**Account Information:** For the purposes of this Privacy Policy, account information ("Account Information") includes without limitation: name, address, email address, phone number, username, photograph, IP address, device ID, geolocation information, account numbers, account types, details of funding instruments associated with the account, details of payment transactions, details of commercial transactions, customer statements and reports, account preferences, details of identity collected as part of our "know your customer" checks on you, and customer correspondence.

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### 3. How We Use the Information We Collect

**Internal Uses:** We collect, store and process your information on servers located in the United States and elsewhere in the world where PayPal facilities are located. Our primary purpose in collecting your information is to provide you with a safe, smooth, efficient, and customised experience. You agree that we may use your personal information to:

- process transactions and provide the PayPal Services;
- verify your identity, including during account creation and password reset processes;
- resolve disputes, collect fees, and troubleshoot problems;
- manage risk, or to detect, prevent, and/or remediate fraud or other potentially illegal or prohibited activities;
- detect, prevent or remediate violations of policies or applicable user agreements;
- provide you with customer support services;
- improve the PayPal Services by customising your user experience;
- measure the performance of the PayPal Services and improve their content and layout;
- manage and protect our information technology infrastructure;
- provide targeted marketing and advertising, provide service updates, and deliver promotional offers based on the communication preferences you have defined for your

PayPal account (please refer to the section "Our Contact with PayPal Customers" below) and your activities when using the PayPal Services; and

- perform creditworthiness and solvency checks, compare information for accuracy, and verify it with third parties.

**Questionnaires, Sweepstakes, Surveys and Profile Data:** If you choose to answer our optional questionnaires or surveys, we may use such information to improve PayPal Services, send you marketing or advertising information, manage the sweepstakes, or as otherwise explained in detail in the survey itself.

**Our Contact with PayPal Customers:** We communicate with our users on a regular basis via email to provide requested services. We also communicate with our users by phone to:

- resolve customer complaints or claims made by users via the PayPal Services;
- respond to requests for customer service;
- inform users if we believe their accounts or any of their transactions have been used for an illegitimate purpose;
- confirm information concerning a user's identity, business or account activity;
- carry out collection activities;
- conduct customer surveys; and
- investigate suspicious transactions.

We use your email or physical address to confirm your opening of a PayPal account, to send you notice of payments that you send or receive through PayPal (including referral payments described below), to send you information about important changes to our products and services, and to send notices and other disclosures required by law. Generally, users cannot opt out of these communications, but they will be primarily informational in nature rather than promotional.

We also use your email address to send you other types of communications that you can control, including "News from PayPal", auction tips, customer surveys and notice of special third-party promotions. You can choose whether to receive some, all or none of these communications when you complete the registration process, or at any time thereafter, by logging in to your account on the PayPal website, selecting My Account, Profile, then My account settings, and updating your Communication preferences.

We may communicate with you as described above by SMS (and SMS will be treated as an email for the purpose of managing your Communication Preferences).

In connection with independent audits of our financial statements and operations, the auditors may seek to contact a sample of our customers to confirm that our records are accurate. However, these auditors cannot use personally identifiable information for any secondary purposes.

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## 4. Marketing

We may combine your information with information we collect from other companies and use it to improve and personalise the PayPal Services. If you don't wish to receive marketing communications from us or participate in our ad-customisation programmes, simply log in to your account, select My Account, Profile, then Notification settings and update your Communication preferences, or follow the directions provided with the communication or advertisement.

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## 5. How We Share Information with Other PayPal Users

If you are a registered PayPal user, your name, email address, phone number (if applicable) date of sign-up, the number of payments you have received from verified PayPal users, and whether you have been verified to have control of a bank account are made available to other PayPal customers whom you have paid or senders who are attempting to pay you using the PayPal Services. If you are a Business account holder, we will also display to other PayPal customers the website address (URL) and customer service contact information that you provide us. In addition, this and other information may also be shared with third parties when you use these third parties to access the PayPal Services. However, your credit card number, bank account and other financial information will not be revealed to anyone whom you have paid or who has paid you through the PayPal Services or third parties that use the PayPal Services, except with your express permission or if we are required to do so pursuant to credit card rules, a court order or other legal process.

If you are buying goods or services and pay through PayPal, we may provide the seller with the delivery address for the goods and your billing address to complete your transaction. If an attempt to pay your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful payment. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

If you are using your mobile app, we may share your picture that you have stored with your mobile app with other PayPal users so that they can identify you. You license us to use your image for the above purposes on a non-exclusive, worldwide, royalty-free, transferable and sub-licensable basis.

We may also share with other users the fact that you are within local reach as a customer. If you do not want this information to be shared, you can access, view and control the settings for any such data on your mobile device.

If you use PayPal as means of logging into external websites or mobile apps, we may share your login status with any third party offering this Service as a login method, as well as the personal and other Account Information that you consent to being shared so that the third party can recognise you. PayPal will not give such third party access to your PayPal Account and will only make payments from your Account to that third party with your specific authorisation. You can access, view and control the settings for any such data sharing with merchants when logged into your PayPal account.

If you link your membership of an eligible loyalty scheme to your Account in our mobile app, we may share your loyalty scheme membership ID with any merchant participating in the relevant loyalty scheme when you pay that merchant using PayPal. If you remove your loyalty scheme membership ID from your Account, we will stop sharing this information.

We work with third parties including merchants to enable them to accept or facilitate payments from or to you using the PayPal Services. In doing so, a third party may share information about you with us such as your email address or phone number, when a payment is sent to you or when you are attempting to pay that third party. We use this information to confirm that you are a PayPal customer and that PayPal can be enabled to make a payment, or where a payment is sent to you to send you a notification that you have received a payment. Also, if you request that we validate your status as a PayPal customer with a third party, we will do so. Please note that third parties you buy from and contract with may have their own privacy policies, and PayPal is not responsible for their operations, including but not limited to their information practices.

If you open a PayPal account directly on a third-party website or via a third party application, any information that you enter on that website or application (and not directly through the PayPal Services) will be shared with the owner of such third party website or application and your information may be subject to their privacy policies.

By accepting this Privacy Policy, you expressly agree and consent that each time you pay or attempt to pay another PayPal customer (including a merchant) using your PayPal account, PayPal may transfer the aforementioned relevant data to such PayPal customer, who may be located outside the European Economic Area (EEA), in order to process, execute or otherwise deal with and provide information about the payment. You also expressly agree and consent to PayPal providing transactional information and other information necessary for the use of a PayPal mobile application (including point of sale products) to a merchant or another PayPal customer who you have explicitly selected or chosen using the PayPal mobile application or point of sale product.

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## 6. How We Share Information with Other Third Parties

PayPal will not sell or rent any of your personal information to third parties for their marketing purposes without your explicit consent, and will only disclose this information in the limited circumstances and for the purposes described in this Privacy Policy. This includes transfers of data to non-EEA member states.

Specifically, you consent to and direct PayPal to do any and all of the following with your information:

- a. Disclose necessary information to: the police and other law enforcement agencies; security forces; competent governmental, intergovernmental or supranational bodies; competent agencies (other than tax related authorities), departments, regulatory authorities, self-regulatory authorities or organisations (including, without limitation, the Agencies referenced in the "Agencies" section [here](#)) and other third parties, including PayPal Group companies, that we have reason to believe it is appropriate for us to cooperate with in investigations of fraud or other illegal activity or potential illegal activity, or to conduct investigations of violations of our User Agreement (including without limitation, your funding source or credit or debit card provider).

We and other organisations, including parties that accept PayPal, may also share, access and use (including from other countries) necessary information (including, without limitation the information recorded by fraud prevention agencies) to help us and them assess and to manage risk (including, without limitation, to prevent fraud, money laundering and terrorist financing). Please [contact us](#) if you want to receive further details of the relevant fraud prevention agencies. For more information on these Agencies, fraud prevention agencies and other third parties, click [here](#).

- b. Disclose necessary information in response to the requirements of the credit card associations or a civil or criminal legal process.
- c. If you as a merchant use a third party to access or integrate PayPal, we may disclose to any such partner necessary information for the purpose of facilitating and maintaining such an arrangement (including, without limitation, the status of your PayPal integration, whether you have an active PayPal account and whether you may already be working with a different PayPal integration partner).
- d. Disclose necessary information to the payment processors, auditors, customer services providers, credit reference and fraud agencies, financial products providers, commercial partners, marketing and public relations companies, operational services providers, group companies, agencies, marketplaces and other third parties listed [here](#). The purpose of this disclosure is to allow us to provide PayPal Services to you. We also set out in the [list of third parties](#), under each "Category", non-exclusive examples of the actual third parties (which may include their assigns and successors) to whom we currently disclose your Account Information or to whom we may consider disclosing your Account Information, together with the purpose of doing so, and the actual information we disclose (except as explicitly stated, these third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information was shared).
- e. Disclose necessary information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
- f. Disclose aggregated statistical data with our business partners or for public relations. For example, we may disclose that a specific percentage of our users live in Manchester. However, this aggregated information is not tied to personal information.
- g. Share necessary Account Information with unaffiliated third parties (listed [here](#)) for their use for the following purposes:
- Fraud Prevention and Risk Management:** to help prevent fraud or assess and manage risk. For example, if you use the PayPal Services to buy or sell goods using eBay Inc, or its affiliates ("eBay"), we may share Account Information with eBay in order to help protect your accounts from fraudulent activity, alert you if we detect such fraudulent activity on your accounts, or evaluate credit risk.

As part of our fraud prevention and risk management efforts, we also may share necessary Account Information with eBay in cases where PayPal has placed a hold or other restriction on your account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share Account Information with eBay to enable them to operate their programmes for evaluating buyers or sellers.

- Customer Service:** for customer service purposes, including to help service your accounts or resolve disputes (e.g., [billing](#) or transactional).
- Shipping:** in connection with shipping and related services for purchases made using PayPal.
- Legal Compliance:** to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
- Service Providers:** to enable service providers under contract with us to support our business operations, such as fraud prevention, [bill collection](#), marketing, customer service and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.

**Mergers or Acquisitions:** As with any other business, it is possible that in the future PayPal could merge with, or be acquired by, another company. If such an acquisition occurs, you consent to the successor company having access to the information maintained by PayPal, including customer Account Information, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

**Third Party Sites:** If you open a PayPal account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a PayPal website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. PayPal is not responsible for the content or information practices of such third parties.

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## 7. Cross Border Transfers of your Information

PayPal is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where such data is transferred outside of the EEA.

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## 8. Your Use of Information and PayPal Services

In order to facilitate the transactions between PayPal users, PayPal Services allows you limited access other users' contact or delivery information. As a seller you may have access to the User ID, email address and other contact or delivery information of the buyer, and as a buyer you may have access to the User ID, email address and other contact information of the seller.

You agree that, with respect to other users' personally identifiable information that you obtain through the PayPal Services or through a PayPal-related communication or PayPal-facilitated transaction, you will only use this information for: (a) PayPal-related communications that are not unsolicited commercial messages, (b) ancillary actions in relation to the PayPal payments or the transactions for which PayPal has been used (e.g. insurance, delivery and fraud complaints), and (c) any other purpose that such user consents to after adequate disclosure of the purpose(s).

In all cases, you must provide users with the opportunity to remove their data from your database and review any information you have collected about them. More generally, you must comply with all applicable privacy regulations, in particular as they relate to the sending of marketing emails.

PayPal does not tolerate spam. We strictly enforce our Anti-Spam Policy. To report PayPal-related spam to PayPal, please [contact us](#).

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## 9. Information Security

PayPal is committed to handling your customer information with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

For more information on PayPal's security practices, please see our [Safety Advice](#).

The security of your PayPal account also relies on your protection of your PayPal password. You may not share your PayPal password with anyone. PayPal representatives will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorised and suspicious and forwarded to [spoof@paypal.com](mailto:spoof@paypal.com). If you do share your PayPal password with a third party for any reason, including because the third party has promised to provide you additional services such as account aggregation, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also [contact us](#) right away.

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## 10. Accessing and Changing Your Information

You can review the personal information you have provided us and make any desired changes to such information, or to the settings for your PayPal account, at any time by logging in to your account on the PayPal website, selecting My Account, then Profile and changing your preferences. You can also close your account through the PayPal website. If you close your PayPal account, we will mark your account in our database as "Closed", but will keep your Account Information in our database. This is for instance necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement authorities, or as required by law.

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## 11. Accountability

Our privacy office is responsible for ensuring that our day-to-day procedures comply with this Privacy Policy. If you want to exercise your right to access your information or have any questions about this privacy statement, PayPal's information practices, or your dealings with PayPal, you can contact us by using [this form](#), or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.l et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg.

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## 12. IMPORTANT DATA PROTECTION INFORMATION FOR USERS RECEIVING PAYMENTS THROUGH WEBSITE PAYMENTS PRO (INCLUDING VIRTUAL TERMINAL) AND/OR PAYPAL HERE\*

\* PayPal Here is PayPal POS Functionality within the PayPal Mobile App (as defined in our User Agreement) that enables a User to pay another User (typically a merchant) or anybody to make a direct card payment to that merchant, in each case for goods and services at a physical point of sale (for example, in store).

### A GUIDE TO THE USE OF YOUR PERSONAL DATA BY PAYPAL (EUROPE) S.À.R.L. ET CIE, S.C.A. AND CREDIT REFERENCE AGENCIES

#### SECTION 1: GENERAL INFORMATION ON OUR USE OF CREDIT REFERENCE AGENCIES

##### Q: What is a credit reference agency?

A: Credit reference agencies (CRAs) collect and maintain information on consumers' and businesses' credit behaviour, on behalf of financial institutions and lenders in the UK.

##### Q: Why do you use them when I have applied to your organisation?

A: Although you have applied to us, PayPal (Europe) S.à.r.l et Cie, S.C.A. and we will check our own records, we may also contact CRAs to get information on your, your financial and/or business associates' and your business' credit behaviour with other organisations. This will help us make the best possible assessment of your overall situation before we make a decision.

##### Q: Where do they get the information?

A: From publicly available sources, including:

- electoral registers maintained by local authorities;
- County Court Judgments records operated by Registry Trust Limited;
- bankruptcy information held by the Insolvency Service; and
- fraud information from fraud prevention agencies.

Credit information also comes from information on applications to banks, building societies, credit card companies etc. and also from the conduct of those accounts.

##### Q: How will I know if my information is to be sent to a CRA or fraud prevention agency?

A: Organisations are only allowed to send information to CRAs and/or fraud prevention agencies with your agreement and knowledge. You will be told when you apply for Website Payments Pro or PayPal Here if your data will be supplied. The next section of this document will tell you how, when and why we search information at CRAs and what we do with the information we obtain from them. We will also tell you if we plan to send information on you or your business, if you have one, to CRAs.

##### Q: Why is my data used in this way?

A: We and other organisations want to make the best possible decisions we can, in order to make sure that you, or your business, will be able to carry out your obligations to us. We and other organisations may also use the information to check your identity. In this way we can ensure that we all make responsible decisions. At the same time we also want to make decisions quickly and easily and, by using up-to-date information, provided electronically, we are able to make the most reliable and fair decisions possible.

##### Q: Who controls what credit reference agencies are allowed to do with my data?

A: All organisations that collect and process personal data are regulated by the Data Protection Act 1998, overseen by the Office of the Information Commissioner. All credit reference agencies are in regular dialogue with the Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000.

##### Q: Can just anyone look at my data held at credit reference agencies?

A: No, access to your information is very strictly controlled and only those that are entitled to do so may see it. Usually that will only be with your agreement or (very occasionally) if there is a legal requirement.

#### SECTION 2: WHAT PAYPAL (EUROPE) S.À.R.L. ET CIE, S.C.A. DOES

Please read this section very carefully.

##### a. When you apply to us for Website Payments Pro or PayPal Here we may:

- i. Check our own records for information on your PayPal account(s).
- ii. Search at credit reference agencies for:
  1. public data on your credit behaviour;
  2. information on the conduct of your personal credit accounts if you are proprietors of a small business; and
  3. information on your business accounts.
- iii. Search at fraud prevention agencies for information on you

##### b. What we do with the information you supply to us as part of the application:

- i. Information that is supplied to us will be sent to credit reference agencies.
- ii. If you give us false or inaccurate information and we suspect fraud, we will record this and may also pass this information to financial and other organisations involved in fraud prevention to protect us, them and our respective customers from theft and fraud.

- iii. Your data may also be used by PayPal, to offer your business other products.
- c. **With the information that we obtain we will:**
  - i. Assess your application for Website Payments Pro or PayPal Here;
  - ii. Verify your identity and the identity of other directors/partners;
  - iii. Undertake checks for the prevention and detection of fraud and/or money laundering;
  - iv. Possibly use scoring methods to assess this application and to verify your identity;
  - v. Manage your PayPal account(s) with ourselves; and/or
  - vi. Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services.
  - vii. Any or all of these processes may be automated.
- d. **What we do when you have set up Website Payments Pro or PayPal Here:**
  - i. Where you have access to and use Website Payments Pro or PayPal Here, we will give details of your PayPal account and other details of your use of Website Payments Pro or PayPal Here (as the case may be), including names and parties to the account, and how you manage it to credit reference agencies.
  - ii. If you owe us money and do not pay in full and on time, we will tell credit reference agencies.
  - iii. We may make periodic searches of our own group records, credit reference and fraud prevention agencies to manage your account with us, to take decisions regarding your identity and also credit, including whether to make Website Payments Pro or PayPal Here (as the case may be) available or to continue or extend existing services to you.
  - iv. If you owe us money and do not make payments that you owe us, we will trace your whereabouts and recover payment.

### SECTION 3: WHAT CREDIT REFERENCE AGENCIES DO

- a. **When credit reference agencies receive a search from us they will:**
  - i. Place a search "footprint" on you and/or your business' credit file whether or not this application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future.
  - ii. Link together the previous and subsequent names advised by you, of anyone that is a party to the account.
- b. **Supply to us:**
  - i. Information about you and/or your business or credit information such as previous applications for credit and the conduct of the accounts;
  - ii. Public information, such as details of County Court Judgments (CCJs) and bankruptcies;
  - iii. Electoral register information on you and your business partners; and/or
  - iv. Fraud prevention information.
- c. **When information is supplied by us, to them, on your account(s):**
  - i. Credit reference agencies will record the details that are supplied on your account including previous and subsequent names of the parties
  - ii. If you owe us money and do not pay in full and on time, credit reference agencies will record the outstanding debt.
  - iii. Records shared with credit reference agencies remain on file for six years after they are closed whether settled by you or defaulted.
- d. **How your data WILL NOT be used by credit reference agencies:**
  - i. It will not be used to create a blacklist.
  - ii. It will not be used by the credit reference agency to make a decision.
- e. **How your data WILL be used by credit reference agencies:**
  - i. The information which we, other organisations and fraud prevention agencies provide to the credit reference agencies about you, your financial and/or business associates and your business may be supplied by credit reference agencies to other organisations and used by them to:
    1. Verify your identity if you or your financial or business associate applies for other facilities including all types of insurance applications and claims.
    2. Assist other organisations to make decisions on credit, credit related services and on motor, household, life and other insurance proposals and insurance claims, about you, your partner, other members of your household or your business.
    3. Trace your whereabouts and recover payment if you do not make payments that you owe.
    4. Conduct checks for the prevention and detection of crime including fraud and/or money laundering.
    5. Manage your personal, your partner's and/or business account
    6. Manage your personal, your partner's and/or business insurance policies (if you have one/any).
    7. Undertake statistical analysis and system testing.
  - ii. Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.
  - iii. Your data may also be used to offer you other products, but only if you have not opted out of receiving such offers.

#### How to Find Out More

You can contact credit reference agencies currently operating in the UK (the main ones are listed below). The information they hold may not be the same so it is worth contacting them all. They will charge a small statutory fee **CallCredit Ltd.**, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ

0870 0601 414 (UK)

[www.callcredit.co.uk](http://www.callcredit.co.uk)

**Experian**, CreditExpert, PO Box 7710, Nottingham, NG80 7WE

0870 2416 212 (UK)

[www.experian.co.uk](http://www.experian.co.uk)

**Equifax Plc**, Credit File Advice Centre, PO Box 1140, Bradford, BD1 5US

0870 0100 583 (UK)

[www.equifax.co.uk](http://www.equifax.co.uk)

**Dun & Bradstreet Ltd**, Customer Service Department, Marlow International, Parkway, Marlow, Bucks, SL7

1AJ

0845 145 1700 (UK)  
<http://www.dnb.co.uk>

If you want to receive details of those fraud prevention agencies from whom we obtain and with whom we record information about you, write to us at PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg. You have a legal right to these details.

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## Updated Privacy Policy for PayPal Services

This version of the **Privacy Policy** will take effect on February 23, 2016. Changed text is shown underlined.

**Jump to section:**

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- [12. IMPORTANT DATA PROTECTION INFORMATION FOR USERS RECEIVING PAYMENTS THROUGH WEBSITE PAYMENTS PRO \(INCLUDING VIRTUAL TERMINAL\) AND/OR PAYPAL HERE\\*](#)

Please view, read, [download and save](#) this Privacy Policy

This Privacy Policy governs your use of products, services, content, features, technologies or functions offered by PayPal and all related sites, applications, and services (collectively "PayPal Services") (including, without limitation, when you provide any information in relation to your use of PayPal Services).

You accept and consent to this Privacy Policy when you sign up for, access, or use the PayPal Services. **By accepting and consenting to this Privacy Policy, you expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy.**

### 1. Overview

In order to operate the PayPal Services and to reduce the risk of fraud, PayPal (Europe) S.à r.l. et Cie, S.C.A. ("PayPal", "our", "us" or "we"), the data controller, must ask you to provide us with information about yourself, including your credit or debit card and/or bank account details. By consenting to, and agreeing the terms of, this Privacy Policy, you expressly consent and agree to us processing your data in the manner set out herein. This Privacy Policy describes the information we collect and how we use that information. PayPal takes the processing of your information very seriously and will use your information only in accordance with the terms of this Privacy Policy. For the purposes of this Privacy Policy, the term "information" means any confidential and/or personally identifiable information or other information related to users of PayPal Services, including but not limited to customers and merchants (legal entities).

We will not sell or rent your information to third parties for their marketing purposes without your explicit consent. However, in order for us to offer PayPal Services to our users; enhance the quality of PayPal Services from time to time; and protect the interests of our users, we will in limited circumstances share some of your information with third parties under strict restrictions, as described in more detail in Sections 3, 5, and 6 of this Privacy Policy. It is important for you to review this Privacy Policy as it applies to all the PayPal Services.

This Privacy Policy is intended to govern the use of PayPal Services by our users (including, without limitation those who use the PayPal Services in the course of their trade or business) unless otherwise agreed through contract.

**Changes to this Privacy Policy:** All future changes to this Privacy Policy set out in the [Policy Update](#) already published on the "Legal Agreements" landing page of the PayPal website at the time you register for the PayPal Services are incorporated by reference into this Privacy Policy and will take effect as specified in the [Policy Update](#). "Policy Update" means a prior notice of changes to any of your agreements with PayPal which PayPal may make available to you in writing. If you disagree with the terms of this Privacy Policy, please do not register for or use the PayPal Services.

**Notification of Changes:** This Privacy Policy may be revised over time as new features are added to the PayPal Services or as we incorporate suggestions from our customers. We may change this Privacy Policy at any time by posting a revised version of it on our website. Unless we have legal grounds to do otherwise, we will provide you with at least 30 days' prior notice of the effective date of the revised privacy policy. We may post the notice on the "Policy Updates" page of our website(s) and/or send the notice by e-mail. As of the effective date of the revised privacy policy, you will be considered as having consented to all changes to the Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time.

Please check the PayPal website [here](#) on a regular basis for the most current version of our Privacy Policy.

**Third Party Websites:** Some pages on the PayPal website include links to third-party websites. These sites are governed by their own privacy statements, and PayPal is not responsible for their operations, including but not limited to their information practices. Users submitting information to or through these third-party websites should review the privacy statements of these sites before providing them with personally identifiable information.

**Not a Framework Contract:** For the avoidance of doubt, this Privacy Policy does not constitute a "framework contract" for the purpose of the EU Payment Services Directive (2007/64/EC) or any implementation of that directive in the European Union or EEA (including, without limitation, the UK Payment Services Regulations 2009).

**A Special Note about Children:** Children are not eligible to use PayPal Services and we ask that minors (persons under the age of 18) do not submit any personal information to us or use the PayPal Services.

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### 2. Information We Collect

**Required Information:** To open a PayPal account or use the PayPal Services, you must provide your name, address, phone number, and email address. In order to make payments through the PayPal Services, you must provide credit card, debit card or bank account information. We also ask you to choose two different security questions to answer (such as your city of birth or your pet's name).

We will also require other commercial and/or identification information if you send or receive certain high-value transactions or high overall payment volumes through the PayPal Services or as is otherwise required in order for us to comply with our anti-money laundering obligations under European law.

**Using your device:** When you use PayPal Services using any device (whether connected to PayPal wirelessly or by a fixed line or otherwise), we may additionally collect and store device sign-on data (including but not limited to device ID) and geolocation data in order to provide PayPal Services.

**Photographs:** If you use certain functionalities provided by us (including, without limitation, PayPal POS functionality on your mobile app) we may ask you to upload a picture of you in order to provide these specific services. Your face must be recognisable. Your image is solely your responsibility.

**Loyalty Information:** If we allow you to link your membership of an eligible loyalty scheme to your account, we may require you to provide to us your loyalty scheme

membership ID.

**Transaction Information:** When you use the PayPal Services to send money to someone else or request money from someone else, we ask you to provide information related to that transaction. This information includes the amount and type of the transaction (purchase of goods, purchase of services, or simple money transfer), other purchase details and the email address, or phone number of the third party. Also, when you send money to another PayPal customer, you may be asked to provide personal details to that customer to complete the transaction. Those details may also be passed on to us from that customer. We also collect the Internet address (IP address) and other identifying information about the computer or device you use to access your PayPal account or use the PayPal Services, in order to help detect possible instances of unauthorised transactions.

**Information About You From Third Parties:** In order to protect all our customers against potential fraud, we verify the information you provide with [Payment Processors](#) and/or [Credit Reference and Fraud Agencies](#). In the course of such verification, we receive personally identifiable information about you from such services. In particular, if you register a credit card or debit card or bank account with PayPal, we will use card authorisation and fraud screening services to verify that your bank or card information and address match the information you supplied to PayPal, and that the card has not been reported as lost or stolen.

If you send or receive high overall payment volumes through the PayPal Services, or if as a merchant have limited selling history, in some circumstances we will conduct a background check on your business by obtaining information about you and your business, and potentially (if legally permitted) also about your directors, shareholders and partners, from a [credit reference or fraud agency](#). If you owe us money, we may conduct a credit check on you by obtaining additional information about you from a credit reference or fraud agency, to the extent permitted by law. PayPal, at its sole discretion, reserves the right to periodically retrieve and review a business and/or consumer credit report supplied by such credit reference or fraud agency for any account, and reserves the right to close an account based on information obtained during this credit review process.

If you use your PayPal account to sell items, we may also collect public information about your business and your behaviour on social media platforms (such as the e-mail address and the number of "likes" and "followers"), to the extent relevant to confirm an assessment of your transactions and/or your business, including its size and the size of its customer base.

**Information About You from Other Sources:** We may also collect information about you from other sources, including from members of PayPal's corporate family, other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole).

**Additional Verification:** If we cannot verify the information that you provide, or if you request a withdrawal by cheque to an address other than your verified credit card billing address, we may ask you to upload or send us additional information by fax (such as your driving licence, credit card statement, and/or a recent utility bill, or other information linking you to the applicable address), or to answer additional questions online to help verify your information.

**Website Traffic Information:** Because of the way Internet communication standards work, when you arrive at or leave the PayPal website, we automatically receive the web address of the site that you came from or are going to. We also collect information on which pages of our website you visit, IP addresses, the type of browser you use and the times you access our website.

**Cookies, Web Beacons, Local Storage and Similar Technologies:** When you access our website or use PayPal Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use Cookies to recognise you as a customer, customise PayPal Services, content and advertising, measure promotional effectiveness, help ensure that your account security is not compromised, mitigate risk and prevent fraud, and to promote trust and safety across our sites and PayPal Services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and PayPal Services.

For more detailed information on our use of these technologies, please see our policy on [Cookies, Web Beacons, and Similar Technologies](#).

**Communications:** When you communicate with us for customer service or other purposes (e.g., by emails, faxes, phone calls, tweets, etc.), we retain such information and our responses to you in the records of your account.

**Questionnaires, Surveys, Sweepstakes and Profile Data:** From time to time, we offer optional questionnaires, surveys and sweepstakes to our users for such purposes as collecting demographic information or assessing users' interests and needs. If we collect personally identifiable information from our users in these questionnaires, surveys, and sweepstakes, the users will be given notice of how the information will be used prior to their participation in the survey, questionnaire or sweepstake.

**Individuals who are not Registered Users of PayPal Services and Requests:** When a registered user of the PayPal Services attempts to engage an individual who is not a registered user of the PayPal Services in a transaction (for instance, by sending a payment or other benefit to, or requesting a payment from that individual), we will retain the information that the registered user of the PayPal Services submits to us, including, for example, the other party's email address, phone number and/or name. Although this particular information is stored for a certain period of time in compliance with applicable law, we will not use it to market to the non-registered person. Additionally, these persons have the same rights to access and correct information about themselves (assuming that their details were correct) as anyone else who uses the PayPal Services.

**Account Information:** For the purposes of this Privacy Policy, account information ("Account Information") includes without limitation: name, address, email address, phone number, username, photograph, IP address, device ID, geolocation information, account numbers, account types, details of funding instruments associated with the account, details of payment transactions, details of commercial transactions, customer statements and reports, account preferences, details of identity collected as part of our "know your customer" checks on you, and customer correspondence.

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### 3. How We Use the Information We Collect

**Internal Uses:** We collect, store and process your information on servers located in the United States and elsewhere in the world where PayPal facilities are located. Our primary purpose in collecting your information is to provide you with a safe, smooth, efficient, and customised experience. You agree that we may use your personal information to:

- process transactions and provide the PayPal Services;
- verify your identity, including during account creation and password reset processes;
- resolve disputes, collect fees, and troubleshoot problems;
- manage risk, or to detect, prevent, and/or remediate fraud or other potentially illegal or prohibited activities;
- detect, prevent or remediate violations of policies or applicable user agreements;
- provide you with customer support services;
- improve the PayPal Services by customising your user experience;
- measure the performance of the PayPal Services and improve their content and layout;
- manage and protect our information technology infrastructure;
- provide targeted marketing and advertising, provide service updates, and deliver promotional offers based on the communication preferences you have defined for your PayPal account (please refer to the section "Our Contact with PayPal Customers" below) and your activities when using the PayPal Services; and
- perform creditworthiness and solvency checks, compare information for accuracy, and verify it with third parties.

**Questionnaires, Sweepstakes, Surveys and Profile Data:** If you choose to answer our optional questionnaires or surveys, we may use such information to improve PayPal Services, send you marketing or advertising information, manage the sweepstakes, or as otherwise explained in detail in the survey itself.

**Our Contact with PayPal Customers:** We communicate with our users on a regular basis via email to provide requested services. We also communicate with our users by phone to:

- resolve customer complaints or claims made by users via the PayPal Services;
- respond to requests for customer service;
- inform users if we believe their accounts or any of their transactions have been used for an illegitimate purpose;
- confirm information concerning a user's identity, business or account activity;
- carry out collection activities;
- conduct customer surveys; and
- investigate suspicious transactions.

We use your email or physical address to confirm your opening of a PayPal account, to send you notice of payments that you send or receive through PayPal (including referral payments described below), to send you information about important changes to our products and services, and to send notices and other disclosures required by law. Generally, users cannot opt out of these communications, but they will be primarily informational in nature rather than promotional.

We also use your email address to send you other types of communications that you can control, including "News from PayPal", auction tips, customer surveys and notice of special third-party promotions. You can choose whether to receive some, all or none of these communications when you complete the registration process, or at any time thereafter, by logging in to your account on the PayPal website, selecting My Account, Profile, then My account settings, and updating your Communication preferences.

We may communicate with you as described above by SMS (and SMS will be treated as an email for the purpose of managing your Communication Preferences).

In connection with independent audits of our financial statements and operations, the auditors may seek to contact a sample of our customers to confirm that our records are accurate. However, these auditors cannot use personally identifiable information for any secondary purposes.

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## 4. Marketing

We may combine your information with information we collect from other companies and use it to improve and personalise the PayPal Services. If you don't wish to receive marketing communications from us or participate in our ad-customisation programmes, simply log in to your account, select My Account, Profile, then Notification settings and update your Communication preferences, or follow the directions provided with the communication or advertisement.

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## 5. How We Share Information with Other PayPal Users

If you are a registered PayPal user, your name, email address, phone number (if applicable) date of sign-up, the number of payments you have received from verified PayPal users, and whether you have been verified to have control of a bank account are made available to other PayPal customers whom you have paid or senders who are attempting to pay you using the PayPal Services. If you are a Business account holder, we will also display to other PayPal customers the website address (URL) and customer service contact information that you provide us. In addition, this and other information may also be shared with third parties when you use these third parties to access the PayPal Services. However, your credit card number, bank account and other financial information will not be revealed to anyone whom you have paid or who has paid you through the PayPal Services or third parties that use the PayPal Services, except with your express permission or if we are required to do so pursuant to credit card rules, a court order or other legal process.

If you are buying goods or services and pay through PayPal, we may provide the seller with the delivery address for the goods and your billing address to complete your transaction. If an attempt to pay your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful payment. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

If you are using your mobile app, we may share your picture that you have stored with your mobile app with other PayPal users so that they can identify you. You license us to use your image for the above purposes on a non-exclusive, worldwide, royalty-free, transferable and sub-licensable basis.

We may also share with other users the fact that you are within local reach as a customer. If you do not want this information to be shared, you can access, view and control the settings for any such data on your mobile device.

If you use PayPal as means of logging into external websites or mobile apps, we may share your login status with any third party offering this Service as a login method, as well as the personal and other Account Information that you consent to being shared so that the third party can recognise you. PayPal will not give such third party access to your PayPal Account and will only make payments from your Account to that third party with your specific authorisation. You can access, view and control the settings for any such data sharing with merchants when logged into your PayPal account.

If you link your membership of an eligible loyalty scheme to your Account in our mobile app, we may share your loyalty scheme membership ID with any merchant participating in the relevant loyalty scheme when you pay that merchant using PayPal. If you remove your loyalty scheme membership ID from your Account, we will stop sharing this information.

We work with third parties including merchants to enable them to accept or facilitate payments from or to you using the PayPal Services. In doing so, a third party may share information about you with us such as your email address or phone number, when a payment is sent to you or when you are attempting to pay that third party. We use this information to confirm that you are a PayPal customer and that PayPal can be enabled to make a payment, or where a payment is sent to you to send you a notification that you have received a payment. Also, if you request that we validate your status as a PayPal customer with a third party, we will do so. Please note that third parties you buy from and contract with may have their own privacy policies, and PayPal is not responsible for their operations, including but not limited to their information practices.

If you open a PayPal account directly on a third-party website or via a third party application, any information that you enter on that website or application (and not directly through the PayPal Services) will be shared with the owner of such third party website or application and your information may be subject to their privacy policies.

By accepting this Privacy Policy, you expressly agree and consent that each time you pay or attempt to pay another PayPal customer (including a merchant) using your PayPal account, PayPal may transfer the aforementioned relevant data to such PayPal customer, who may be located outside the European Economic Area (EEA), in order to process, execute or otherwise deal with and provide information about the payment. You also expressly agree and consent to PayPal providing transactional information and other information necessary for the use of a PayPal mobile application (including point of sale products) to a merchant or another PayPal customer who you have explicitly selected or chosen using the PayPal mobile application or point of sale product.

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## 6. How We Share Information with Other Third Parties

Just like most banks or financial/payment service providers, PayPal works with third-party service providers which provide important functions to us that allow us to be an easier, faster, and safer way to make payments, and other business partners. We need to disclose user data to them from time to time so that the services can be performed.

In general, the Luxembourg laws to which PayPal's handling of user data is subject (data protection and bank secrecy) require a higher degree of transparency than most other EU laws. This is why, unlike the vast majority of providers of internet-based services or financial services in the EU, PayPal has listed in this Privacy Policy the third party service providers and business partners to whom we may disclose your data, together with the purpose of disclosure and type of information disclosed. You will find a link to those third parties [here](#) as well as in paragraphs a, b, d and g below. By accepting this Privacy Policy and maintaining an account with PayPal, you expressly consent to the transfer of your data to those third parties for the purposes listed.

PayPal may update the list of third parties referred to above every quarter (January 1st, April 1st, July 1st and October 1st). PayPal will only start transferring any data to any of the new entities or for the new purposes or data types indicated in each update after 30 days from the date when that list is made public through this Privacy Policy. You should review the list each quarter on the PayPal website on the dates stated above. If you do not object to the new data disclosure, within 30 days after the publication of the updated list of third parties, you are deemed to have accepted the changes to the list and to this Privacy Policy. If you do not agree with the changes, you may close your

account and stop using our services.

PayPal will not sell or rent any of your personal information to third parties for their marketing purposes without your explicit consent, and will only disclose this information in the limited circumstances and for the purposes described in this Privacy Policy. This includes transfers of data to non-EEA member states.

Specifically, you consent to and direct PayPal to do any and all of the following with your information:

- a. Disclose necessary information to: the police and other law enforcement agencies; security forces; competent governmental, intergovernmental or supranational bodies; competent agencies (other than tax related authorities), departments, regulatory authorities, self-regulatory authorities or organisations (including, without limitation, the Agencies referenced in the "Agencies" section [here](#)) and other third parties, including PayPal Group companies, that we have reason to believe it is appropriate for us to cooperate with in investigations of fraud or other illegal activity or potential illegal activity, or to conduct investigations of violations of our User Agreement (including without limitation, your funding source or credit or debit card provider).

We and other organisations, including parties that accept PayPal, may also share, access and use (including from other countries) necessary information (including, without limitation the information recorded by fraud prevention agencies) to help us and them assess and to manage risk (including, without limitation, to prevent fraud, money laundering and terrorist financing). Please [contact us](#) if you want to receive further details of the relevant fraud prevention agencies. For more information on these Agencies, fraud prevention agencies and other third parties, click [here](#).

- b. Disclose necessary information in response to the requirements of the credit card associations or a civil or criminal legal process.
- c. If you as a merchant use a third party to access or integrate PayPal, we may disclose to any such partner necessary information for the purpose of facilitating and maintaining such an arrangement (including, without limitation, the status of your PayPal integration, whether you have an active PayPal account and whether you may already be working with a different PayPal integration partner).
- d. Disclose necessary information to the payment processors, auditors, customer services providers, credit reference and fraud agencies, financial products providers, commercial partners, marketing and public relations companies, operational services providers, group companies, agencies, marketplaces and other third parties listed [here](#). The purpose of this disclosure is to allow us to provide PayPal Services to you. We also set out in the [list of third parties](#), under each "Category", non-exclusive examples of the actual third parties (which may include their assigns and successors) to whom we currently disclose your Account Information or to whom we may consider disclosing your Account Information, together with the purpose of doing so, and the actual information we disclose (except as explicitly stated, these third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information was shared).
- e. Disclose necessary information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
- f. Disclose aggregated statistical data with our business partners or for public relations. For example, we may disclose that a specific percentage of our users live in Manchester. However, this aggregated information is not tied to personal information.
- g. Share necessary Account Information with unaffiliated third parties (listed [here](#)) for their use for the following purposes:
  - i. [Fraud Prevention and Risk Management](#): to help prevent fraud or assess and manage risk. For example, if you use the PayPal Services to buy or sell goods using eBay Inc, or its affiliates ("eBay"), we may share Account Information with eBay in order to help protect your accounts from fraudulent activity, alert you if we detect such fraudulent activity on your accounts, or evaluate credit risk.

As part of our fraud prevention and risk management efforts, we also may share necessary Account Information with eBay in cases where PayPal has placed a hold or other restriction on your account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share Account Information with eBay to enable them to operate their programmes for evaluating buyers or sellers.

- ii. [Customer Service](#): for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
- iii. [Shipping](#): in connection with shipping and related services for purchases made using PayPal.
- iv. [Legal Compliance](#): to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
- v. [Service Providers](#): to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection, marketing, customer service and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.

**Mergers or Acquisitions:** As with any other business, it is possible that in the future PayPal could merge with, or be acquired by, another company. If such an acquisition occurs, you consent to the successor company having access to the information maintained by PayPal, including customer Account Information, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

**Third Party Sites:** If you open a PayPal account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a PayPal website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. PayPal is not responsible for the content or information practices of such third parties.

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## 7. Cross Border Transfers of your Information

PayPal is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where such data is transferred outside of the EEA.

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## 8. Your Use of Information and PayPal Services

In order to facilitate the transactions between PayPal users, PayPal Services allows you limited access other users' contact or delivery information. As a seller you may have access to the User ID, email address and other contact or delivery information of the buyer, and as a buyer you may have access to the User ID, email address and other contact information of the seller.

You agree that, with respect to other users' personally identifiable information that you obtain through the PayPal Services or through a PayPal-related communication or PayPal-facilitated transaction, you will only use this information for: (a) PayPal-related communications that are not unsolicited commercial messages, (b) ancillary actions in relation to the PayPal payments or the transactions for which PayPal has been used (e.g. insurance, delivery and fraud complaints), and (c) any other purpose that such user consents to after adequate disclosure of the purpose(s).

In all cases, you must provide users with the opportunity to remove their data from your database and review any information you have collected about them. More generally, you must comply with all applicable privacy regulations, in particular as they relate to the sending of marketing emails.

PayPal does not tolerate spam. We strictly enforce our Anti-Spam Policy. To report PayPal-related spam to PayPal, please [contact us](#).

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## 9. Information Security

PayPal is committed to handling your customer information with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

For more information on PayPal's security practices, please see our [Safety Advice](#).

The security of your PayPal account also relies on your protection of your PayPal password. You may not share your PayPal password with anyone. PayPal representatives will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorised and suspicious and forwarded to [spoof@paypal.com](mailto:spoof@paypal.com). If you do share your PayPal password with a third party for any reason, including because the third party has promised to provide you additional services such as account aggregation, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also [contact us](#) right away.

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## 10. Accessing and Changing Your Information

You can review the personal information you have provided us and make any desired changes to such information, or to the settings for your PayPal account, at any time by logging in to your account on the PayPal website, selecting My Account, then Profile and changing your preferences. You can also close your account through the PayPal website. If you close your PayPal account, we will mark your account in our database as "Closed", but will keep your Account Information in our database. This is for instance necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement authorities, or as required by law.

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## 11. Accountability

Our privacy office is responsible for ensuring that our day-to-day procedures comply with this Privacy Policy. If you want to exercise your right to access your information or have any questions about this privacy statement, PayPal's information practices, or your dealings with PayPal, you can contact us by using [this form](#), or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg.

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## 12. IMPORTANT DATA PROTECTION INFORMATION FOR USERS RECEIVING PAYMENTS THROUGH WEBSITE PAYMENTS PRO (INCLUDING VIRTUAL TERMINAL) AND/OR PAYPAL HERE\*

\* PayPal Here is PayPal POS Functionality within the PayPal Mobile App (as defined in our User Agreement) that enables a User to pay another User (typically a merchant) or anybody to make a direct card payment to that merchant, in each case for goods and services at a physical point of sale (for example, in store).

### A GUIDE TO THE USE OF YOUR PERSONAL DATA BY PAYPAL (EUROPE) S.À.R.L. ET CIE, S.C.A. AND CREDIT REFERENCE AGENCIES

#### SECTION 1: GENERAL INFORMATION ON OUR USE OF CREDIT REFERENCE AGENCIES

##### Q: What is a credit reference agency?

A: Credit reference agencies (CRAs) collect and maintain information on consumers' and businesses' credit behaviour, on behalf of financial institutions and lenders in the UK.

##### Q: Why do you use them when I have applied to your organisation?

A: Although you have applied to us, PayPal (Europe) S.à.r.l. et Cie, S.C.A. and we will check our own records, we may also contact CRAs to get information on your, your financial and/or business associates' and your business' credit behaviour with other organisations. This will help us make the best possible assessment of your overall situation before we make a decision.

##### Q: Where do they get the information?

A: From publicly available sources, including:

- electoral registers maintained by local authorities;
- County Court Judgments records operated by Registry Trust Limited;
- bankruptcy information held by the Insolvency Service; and
- fraud information from fraud prevention agencies.

Credit information also comes from information on applications to banks, building societies, credit card companies etc. and also from the conduct of those accounts.

##### Q: How will I know if my information is to be sent to a CRA or fraud prevention agency?

A: Organisations are only allowed to send information to CRAs and/or fraud prevention agencies with your agreement and knowledge. You will be told when you apply for Website Payments Pro or PayPal Here if your data will be supplied. The next section of this document will tell you how, when and why we search information at CRAs and what we do with the information we obtain from them. We will also tell you if we plan to send information on you or your business, if you have one, to CRAs.

##### Q: Why is my data used in this way?

A: We and other organisations want to make the best possible decisions we can, in order to make sure that you, or your business, will be able to carry out your obligations to us. We and other organisations may also use the information to check your identity. In this way we can ensure that we all make responsible decisions. At the same time we also want to make decisions quickly and easily and, by using up-to-date information, provided electronically, we are able to make the most reliable and fair decisions possible.

##### Q: Who controls what credit reference agencies are allowed to do with my data?

A: All organisations that collect and process personal data are regulated by the Data Protection Act 1998, overseen by the Office of the Information Commissioner. All credit reference agencies are in regular dialogue with the Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000.

##### Q: Can just anyone look at my data held at credit reference agencies?

A: No, access to your information is very strictly controlled and only those that are entitled to do so may see it. Usually that will only be with your agreement or (very occasionally) if there is a legal requirement.

#### SECTION 2: WHAT PAYPAL (EUROPE) S.À.R.L. ET CIE, S.C.A. DOES

Please read this section very carefully.

##### a. When you apply to us for Website Payments Pro or PayPal Here we may:

- i. Check our own records for information on your PayPal account(s).
- ii. Search at credit reference agencies for:
  1. public data on your credit behaviour;
  2. information on the conduct of your personal credit accounts if you are proprietors of a small business; and
  3. information on your business accounts.
- iii. Search at fraud prevention agencies for information on you

**b. What we do with the information you supply to us as part of the application:**

- i. Information that is supplied to us will be sent to credit reference agencies.
- ii. If you give us false or inaccurate information and we suspect fraud, we will record this and may also pass this information to financial and other organisations involved in fraud prevention to protect us, them and our respective customers from theft and fraud.
- iii. Your data may also be used by PayPal, to offer your business other products.

**c. With the information that we obtain we will:**

- i. Assess your application for Website Payments Pro or PayPal Here;
- ii. Verify your identity and the identity of other directors/partners;
- iii. Undertake checks for the prevention and detection of fraud and/or money laundering;
- iv. Possibly use scoring methods to assess this application and to verify your identity;
- v. Manage your PayPal account(s) with ourselves; and/or
- vi. Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services.
- vii. Any or all of these processes may be automated.

**d. What we do when you have set up Website Payments Pro or PayPal Here:**

- i. Where you have access to and use Website Payments Pro or PayPal Here, we will give details of your PayPal account and other details of your use of Website Payments Pro or PayPal Here (as the case may be), including names and parties to the account, and how you manage it to credit reference agencies.
- ii. If you owe us money and do not pay in full and on time, we will tell credit reference agencies.
- iii. We may make periodic searches of our own group records, credit reference and fraud prevention agencies to manage your account with us, to take decisions regarding your identity and also credit, including whether to make Website Payments Pro or PayPal Here (as the case may be) available or to continue or extend existing services to you.
- iv. If you owe us money and do not make payments that you owe us, we will trace your whereabouts and recover payment.

**SECTION 3: WHAT CREDIT REFERENCE AGENCIES DO****a. When credit reference agencies receive a search from us they will:**

- i. Place a search "footprint" on you and/or your business' credit file whether or not this application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future.
- ii. Link together the previous and subsequent names advised by you, of anyone that is a party to the account.

**b. Supply to us:**

- i. Information about you and/or your business or credit information such as previous applications for credit and the conduct of the accounts;
- ii. Public information, such as details of County Court Judgments (CCJs) and bankruptcies;
- iii. Electoral register information on you and your business partners; and/or
- iv. Fraud prevention information.

**c. When information is supplied by us, to them, on your account(s):**

- i. Credit reference agencies will record the details that are supplied on your account including previous and subsequent names of the parties
- ii. If you owe us money and do not pay in full and on time, credit reference agencies will record the outstanding debt.
- iii. Records shared with credit reference agencies remain on file for six years after they are closed whether settled by you or defaulted.

**d. How your data WILL NOT be used by credit reference agencies:**

- i. It will not be used to create a blacklist.
- ii. It will not be used by the credit reference agency to make a decision.

**e. How your data WILL be used by credit reference agencies:**

- i. The information which we, other organisations and fraud prevention agencies provide to the credit reference agencies about you, your financial and/or business associates and your business may be supplied by credit reference agencies to other organisations and used by them to:
  1. Verify your identity if you or your financial or business associate applies for other facilities including all types of insurance applications and claims.
  2. Assist other organisations to make decisions on credit, credit related services and on motor, household, life and other insurance proposals and insurance claims, about you, your partner, other members of your household or your business.
  3. Trace your whereabouts and recover payment if you do not make payments that you owe.
  4. Conduct checks for the prevention and detection of crime including fraud and/or money laundering.
  5. Manage your personal, your partner's and/or business account
  6. Manage your personal, your partner's and/or business insurance policies (if you have one/any).
  7. Undertake statistical analysis and system testing.
- ii. Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.
- iii. Your data may also be used to offer you other products, but only if you have not opted out of receiving such offers.

**How to Find Out More**

You can contact credit reference agencies currently operating in the UK (the main ones are listed below). The information they hold may not be the same so it is worth contacting them all. They will charge a small statutory fee **CallCredit Ltd.**, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ  
0870 0601 414 (UK)

[www.callcredit.co.uk](http://www.callcredit.co.uk)

**Experian**, CreditExpert, PO Box 7710, Nottingham, NG80 7WE  
0870 2416 212 (UK)

[www.experian.co.uk](http://www.experian.co.uk)

**Equifax Plc**, Credit File Advice Centre, PO Box 1140, Bradford, BD1 5US  
0870 0100 583 (UK)  
[www.equifax.co.uk](http://www.equifax.co.uk)

**Dun & Bradstreet Ltd**, Customer Service Department, Marlow International, Parkway, Marlow, Bucks, SL7  
1AJ  
0845 145 1700 (UK)  
<http://www.dnb.co.uk>

**If you want to receive details of those fraud prevention agencies from whom we obtain and with whom we record information about you, write to us at PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg. You have a legal right to these details.**

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