

MCB Privacy Policy for prepaid card (Cash Passport™)

Who we are

The Mauritius Commercial Bank Limited (“MCB”, “we”, “us”, “our”) is duly licensed by the Bank of Mauritius as a banking institution, with its registered address at 9-15, Sir William Newton Street, Port Louis 11328, Mauritius and company number C07000934.

Mastercard Prepaid Management Services Limited (MPMS) is a company incorporated in England and Wales under registration number 05429739 with its registered office at Access House, Cygnet Road, Peterborough, PE7 8FJ, UK. MPMS provides prepaid card programme management services for MCB.

MCB is a member of Mastercard (the “Scheme”) and shall work with MPMS as programme manager, upon and subject to the terms of a Programme Management Services Agreement between the 2 parties. MCB shall issue cards to be distributed through MPMS’ clients and other third parties (“distributor(s)”) upon and subject to their agreement. The Mauritius Commercial Bank (MCB) Ltd recognises the importance of safeguarding the personal information of its customers. The following Privacy Policy sets out the basis on which any of your personal information will be collected, stored, used, and disclosed by us and reflects MCB’s commitment to maintain the confidentiality of personal information and to provide its customers with the best possible service. It also tells you about your rights and choices with respect to your Personal Information, and how you can reach us to update your contact information or get answers to questions you may have about our privacy practices.

Cards

This Privacy Policy is only applicable to prepaid cards (“Card(s)”) issued by MCB and programs managed by MPMS.

MCB is the Data Controller in relation to your Cards and all necessary activities relating to the operation of the Cards: allowing you to receive, activate and use your Card (activating, managing and using your online account where applicable, making and receiving payment transactions, meeting legal requirements, answering requests, providing information to you). You may be the Customer or you may be a person that has been provided with Cards by the Customer.

Distributor

If you provide any personal information to a Card distributor relevant to your Card, the Card distributor is a separate Data Controller for its own activities and you can view its Privacy Policy on its website. The distributor is also a Data Processor acting on our behalf in relation to the Card.

The purpose and legal basis for processing your personal information

Processing is necessary for the performance of your contract with MCB and for the issue and operation of Cards and is necessary for compliance with legal obligations applicable to MCB such as financial crime prevention. With your consent, MCB may use your personal information for marketing purposes and may share your information with third parties, including Mastercard and MPMS and Card distributors, for marketing purposes.

Financial crime prevention

MCB will use your personal information to help decide if your Card accounts may be being used for fraud or money-laundering. We may detect that a Card account is being used in a fraudulent manner from our experience of ways that fraudsters work or we may notice that an account is being used in a way that is unusual. If we think there is a risk of fraud, we may stop activity on the accounts or refuse access to them. We might also check and share your information with fraud prevention agencies. If fraud is identified or suspected, these agencies may keep a record of that information and we may refuse to provide any services. Law enforcement agencies may access and use this information.

Categories of personal information and collection

Type of personal information	Description
Personal Details	Full name and date of birth
Contact Details	Where you live and how to contact you including phone numbers and e-mail addresses
Transactional Data	Details about your Card, use of your Card and payments to and from your accounts
Contractual information	Details about the products or services we provide to you
Locational Data	Data we get about where you are, such as may come from your mobile phone, the address where you connect a computer to the internet, or a shop where you buy something with your Card
Behavioral Data	Details about how you use our products and services
Technical Data	Details on the devices and technology you use
Communications	What we learn about you from letters, emails and conversations between us
Documentary Data	Details about you that are stored in documents in various formats, or copies of them. This could include things like your passport, drivers licence or birth certificate collected to fulfil customer due diligence requirements

For the purpose of this Privacy Notice, “Personal Information” means any information relating to an identified or identifiable individual in connection with the services provided by us (“Services”).

Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, you may not be able to benefit from the Services if that information is necessary to provide you with the Service or if we are legally required to collect it. It could mean that we cancel your Card or Services as per terms and conditions.

Personal information will only be collected directly and voluntarily from you as part of the application process or as a result of transactions relating from the use of your Cards. Some personal information may be verified by MCB with use of publicly accessible sources to fulfil customer due diligence.

Sending personal information outside of the Republic of South Africa

MCB will only send your Personal Information outside of the South Africa (SA) to:

- Follow your instructions
- Comply with a legal duty

In relation to Personal Information processed by Mastercard, certain processors are located outside South Africa. Personal Information processed by Mastercard is subject to Mastercard Binding Corporate Rules which you have enforcement rights under as a third-party beneficiary.

Retention of personal information

We don't keep your Personal Information for longer than we need to, which is usually up to 7 years after the end of the relationship or upon termination of the contract, unless we are required to keep it longer (for example due to a court order or investigation by law enforcement agencies or regulators).

Your Rights

You have certain legal rights to control what we do with your Personal Information. These include:

Access	You have a right to access the Personal Information we hold about you
Rectification	You have a right to rectification of inaccurate Personal Information and to update incomplete Personal Information
Erase	You have a right to request that we delete your Personal Information
Restriction on processing	You have a right to request us to restrict a processing of your Personal Information
Objection to processing	You have a right to object to the processing of your Personal Information
Portability	You have a right to Personal Information portability
Marketing	You have a right to object to direct marketing

Recipients (or categories of recipients) of Personal Information

MCB is committed to ensuring that your information is secure with us and with third parties who act on our behalf. These third parties include MPMS, MasterCard, card manufacturers, suppliers of identity validation services, IVR and call recording (telephone) suppliers. We use many tools to make sure that your information remains confidential and accurate, and we may monitor or record calls, emails, text messages or other communications in order to protect you and us.

If you choose not to give Personal Information

If you choose not to give us your Personal Information, it may mean that we cannot perform Services needed to run your Card accounts. It could mean that we cancel your Card.

How to contact us

You can easily submit a request to exercise your rights or share any questions, comments, or complaints about this Privacy Notice or our privacy practices by emailing us at **MCB_DPO@mcb.mu** or by writing to us at:

The Mauritius Commercial Bank Limited
9-15 Sir William Newton Street
Port Louis 11328
Mauritius