PRIVACY POLICY

ABOUT SMARTE CARTE

Smarte Carte Ireland Ltd Mail Room, Level 4 Terminal 1, Dublin Airport Collinstown, Swords, Co Dublin, K67 KD58 Registered in Ireland, Register Number 751067

DATA CONTROLLER

For the purpose of EU regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, Smarte Carte Ireland Ltd is considered the data controller.

ABOUT THIS PRIVACY POLICY

- Smarte Carte ("we", "us", or "our") is committed to protecting and respecting your personal information and privacy. This policy (together with our cookies policy, website terms of use and any other documents referred to on our website) sets out the basis on which any information we collect from you, or that you provide to us, will be processed by us.
- By visiting www.smartecarte.ie you are accepting and consenting to the
 practices described in this policy.
 Please read the following carefully to understand how we collect and use your
 information. If you have any questions about this policy or our use of your
 information you can contact us at the address above.
- Changes we may make to this policy will be posted on this page.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following information about you:

- Information you give us: You may give us information about you by filling in forms on our website www.smartecarte.ie, by corresponding with us by phone, e-mail, social media or otherwise. This includes information you provide when you use our website, participate in social media functions on our website, enter a promotion or survey and when you report a problem with our website. The information you give us may include your name, address, country of residence, e-mail address, phone number, descriptive appearance and travel details. Please note credit card information is not stored by Smarte Carte at all but with our ecommerce provider.
- Information we collect about you: Each time you visit our website we may automatically collect the following information:
- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone

- setting, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from page.
- Information we receive from other sources: We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that information that it may be shared internally and combined with information collected on this website. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a smooth user experience when you use our website and also allows us to improve our website. For detailed information on the cookies we use and what we use them for see our cookie policy.

USES MADE OF YOUR INFORMATION

We use information held about you in the following ways:

Information you give to us. We will use this information:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- To provide you, or permit selected third parties to provide you, with information about products or services you have purchased or enquired about.

Information we collect about you. We will use this information:

- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our website safe and secure;

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this

information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website. We may disclose your personal information to third parties:
- If Smarte Carte in part or substantial assets are acquired by a third party, in which case information held by it about its customers will be one of the transferred assets:
- We may also disclose data and information about you to our selected partners from law enforcement. This will be primarily to prevent and detect crime.
 Identify offenders and to allow offenders to be prosecuted;
- If we are under a duty to disclose or share your information in order to comply
 with any legal obligation, or in order to enforce or apply our terms and
 conditions and other agreements; or to protect the rights, property, or safety of
 Smarte Carte, our customers, or others. This includes exchanging information
 with other companies and organisations for the purposes of fraud protection
 and credit risk reduction.

WHERE WE STORE YOUR INFORMATION

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our shipping suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your information for a shipping order, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this policy. All information you provide to us is stored on secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) login credentials which enables you to access certain parts of our website, you are responsible for keeping those confidential. You should not share this with anyone.

DISCLAIMER

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to

- Request access to and rectification or erasure of personal data or restriction of processing concerning the information.
- Obtain from the us confirmation as to whether or not your personal data is being processed.
- You can also withdraw your consent to the processing of your information at any time. Smarte Carte may not be able to comply with such requests if retention is required by law.
- Lodge a complaint with a supervisory authority.

Any access request may be subject to a fee of €15.00 to meet our costs in providing you with details of the information we hold about you.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites.

FOR HOW LONG WILL SMARTE CARTE RETAIN MY PERSONAL INFORMATION

Information will be retained for

- A period necessary to fulfil our obligations relating to the Services.
- A period necessary to fulfil the purposes outlined in this Privacy Policy.
- A longer period than mentioned above if retention is required or permitted by law.