

Privacy notice

How we use your information

This privacy notice tells you what to expect when MTACC Limited (also trading as ePayService) collects personal information. If you would like to fully understand our corporate Privacy arrangements, please refer to our Privacy Policy. This privacy notice also applies to our associated companies, such as ePayService Global s.r.o. (also trading as ePayService) collects personal information.

It applies to information we collect about:

- Visitors to our website;
- Clients using our services
- Our legal obligations in relation to Financial Crime Prevention and other obligations applicable to financial services providers
- Job applicant and our current and former employees;

Visitors to our websites

When someone visits www.epayservices.com we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. Information we collect to personally identify you will solely be used to action your request to contact you. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by the MTACC Limited

You can read more about how we use cookies on our Privacy Policy

Search engine

Our website search and decision notice search is powered by WordPress. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either MTACC Limited or any third party.

Security and performance

MTACC Limited uses a third-party service to help maintain the security and performance of its website. To deliver this service it processes the IP addresses of visitors to the MTACC Limited website.

Social media and contacts

We use social media, email, internal tickets inside the client's account, live chat. We do not use phone or any other voice communication channels. At the same time, we never ask or answer questions via social media, which are of a confidential nature and can contain any personal data.

Contacts through social media are designed to answer general questions related to the operation of ePayService and for the extension of customers as one of the sales channels.

List of social media on which we use:

<https://vk.com>

<https://www.facebook.com>

<https://twitter.com>

<https://searchengines.guru>

People who call our office

When you call the MTACC Limited, we do not need other information, other than what is essential to identify you and ensure we are able to help client's queries, and on simple terms, speak to you.

People who email us

Our emails are linked to Google Gmail for Business. More information can be found at <https://gsuite.google.ru/intl/en/>

Accordingly, all security encrypt solutions are on the side of Google.

https://gsuite.google.ru/intl/en/security/?secure-by-design_activeEl=data-centers

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

LiveChat service

We have a LiveChat solution from the German company LiveZilla GmbH <https://www.livezilla.net/home/en/> However, we have not a cloud solution (SaaS), but a "boxed version". This means that we completely bought this software and installed it on your server without access to it from LiveZilla GmbH. All history of conversations with data is stored on our secure server and LiveZilla GmbH should not have access to them.

People who make a complaint to us and Data Subject Access Requests (DSAR).

When we receive a or a DSAR from a person we make up a file containing the details of the complaint/request. This normally contains the identity of the complainant and any other individuals involved.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries or DSARs are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

People who use MTACC Limited services

MTACC Limited offers various services to the public. We use a third party to provide KYC and financial crime remediation services, provided by reputable third parties such as WorldCheck.

We have to hold the details of the people who have requested the service in order to provide it, along with the personal data of the individuals who are being subjected to financial crime and/or KYC remediation services/checks. We only use these details to provide the service the person has requested.

Service providers reporting a breach

Public electronic communications service providers are required by law to report any security breaches involving personal data to the ICO. We will advise if our providers, and other service provider who we may engage reports a data breach.

Job applicants, current and former MTACC Limited employees

MTACC Limited is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at privacy@epayservices.com

What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You do not have to provide what we ask for but it might affect your application if you do not.

Application stage

If you email us, your data will be collected directly by us via our email provider.

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our HR team will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you do not provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can

identify you. Any information you do provide, will be used only to produce and monitor equal opportunities.

Shortlisting

Our hiring managers shortlist applications for interview. They will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

Conditional offer

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- We will provide your email and personal details to the relevant Government service who will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This is done through a data processor (please see below).

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Membership of a Pension scheme – so we can send you a questionnaire to determine whether you are eligible to re-join your previous scheme.

Post start date

Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest. If you complete a declaration, the information will be held on your personnel file.

Use of data processors

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal

information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.

Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.

How we make decisions about recruitment?

Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account.

You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing privacy@epayservices.com

Your rights

Under GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights here – <https://idpc.org.mt/en/Pages/gdpr.aspx>

Complaints or queries

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of MTACC Limited's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact us at privacy@epayservices.com

Access to personal information

MTACC Limited tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to MTACC Limited for any personal information we may hold you need to put the request in writing addressing it to privacy@epayservices.com

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting at the above.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However, when we investigate issues or situations in line with Financial Crime Acts we may need to share personal information with the organisation concerned and with other law enforcement bodies.

You can also get further information on:

- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 18 May 2018.

How to contact us

If you want to request information about our privacy policy you can email us or write to:

2 Floor, St. Julian's Business Centre

Triq. Eliza Zammit, St. Julian's

Malta

Or via email at privacy@epayservices.com