



YSP Global Privacy Notice

Effective 1st January 2025

Last Updated 6th February 2025

Our Global Privacy Notice explains how Yalamanchili and our affiliates collect, use, and share Personal Information when you use our, or our clients' products, services, offers, and promotions.

As a global payment solution provider, Yalamanchili fulfils many roles. When we act on behalf of Yalamanchili Solutions for Payments ("YSP") clients, we only collect, use, and share Personal Information as authorized by the contracts established with our clients. If you have questions about how these companies handle your Personal Information, or if wish to exercise your rights, please contact us.

Where YSP acts a data controller under applicable laws and collects information directly from an individual, the controller is the YSP entity listed on the product terms and conditions you sign when enrolling in a YSP product or offer. Some YSP companies and services have different privacy notices that are provided when you use them.

You can learn more and exercise your privacy choices under relevant laws by contacting our Ethics Risk and Compliance team by e-mailing ERCOfficer@yalamanchili.in.

Personal Information/Personal Data

"Personal Information" refers to information that (alone or when used in combination with other information) is capable of being associated with or could reasonably be associated with an individual. Personal Information, sometimes referred to as "Personal Data", may also have specific meanings under different privacy laws. The Personal Information we collect varies depending on our relationship and interactions with you.

Types of Personal Information

Depending on our relationship and interactions with you, the categories of Personal Information we collect may include:

Your Contact Information – This includes your known as name, official name, username, mailing address, email address(es), home telephone number, mobile number, and social media profile names, along with other personal identifiers.

- *Transaction and Financial Information* – This includes:

- Information about your prepaid/debit/credit card or wallet/account, including your 16-digit payment card number, card expiration date, service code, PIN verification data, and CVV; and
- Your bank account information that supports transactions associated with the YSP card/payment credentials.
- You Unified Payments Interface Identifier (“UPI ID”);
- Information about your transactions, including the date, time, location, and amount of the transaction and information about the merchant who accepted your card/card payment credential. This also may include item-level data in some instances, and billing and shipping information.
- *Relationship Information* – This includes information about your shopping and payment preferences and other information that can help us offer you personalized content, such as:
 - Demographic information, including age/age range and marital or family status;
 - Likelihood that you may be interested in certain purchases or experiencing life events and other propensity scores; and
 - Data from social media profiles and information about your interests.
- *Interaction Information* – This includes information about your interactions with YSP, such as:
 - Information collected when you participate in promotions or reward programs;
 - Card benefits program information, including qualification data and related records;
 - Information collected when you contact us, such as if you contact our Call Center or when you write to or e-mail us;
 - Visitor logs if you visit our offices;
 - Information collected when you attend YSP sponsored events; and
 - Other information you provide us, such as data collected for account authentication (e.g., passwords or account security questions).
- *Biometric Identifiers* – This may include facial recognition data, fingerprints, iris scans, keystroke timing, scroll position, and behavioral data or other physical patterns, such as when you elect to use biometric authentication or e-KYC with YSP.
- *Business Customer Data* – This includes information about your role within your company, your authorization to use products or services, and your authority to place orders; customer/supplier qualification details; and other data you share with us in connection with the relationship.
- *Inferred and Derived Information* – We infer and derive data elements by analyzing our relationship and transactional information. For example, we may generate propensities, attributes, and/or scores for marketing, security, or fraud purposes.
- *Online and Technical Information* – This includes information regarding your interactions with our websites, applications, or advertisements, including IP address, device identifiers, settings,

characteristics, advertising ID, browsing history, web server logs, server log records, activity log records, keystroke timing, and other information collected using cookies and similar technologies.

- *Audio and Visual Information* – This includes audio, electronic, visual, or similar information relating to your interactions with us, including photographs, video images, CCTV recordings, Call Center recordings, call monitoring records, and voicemails.
- *Government Issued Identification Numbers* – This includes Government issued identifiers including your Permanent Account Number (“PAN”), Aadhaar number, voter ID, social security number, driver’s license number, passport number, and other government issued identifiers as may be needed for compliance or given the nature of the relationship.
- *Geolocation Information* – This may include your precise geolocation information, which we may collect automatically from your mobile device if you opt-in to allow us to collect it.
- *Professional and Employment Information* – This includes professional or employment-related information for employees and prospective employees, including applicant and resume data, such as education and employment history; information about qualifications for the position, such as skills and experience; professional interests and goals; information collected for employee qualifications, such as right to work documentation; salary information and references.
- *Compliance Data* – This includes records maintained to demonstrate compliance with applicable laws; records related to consumer preferences, such as your opt-ins and opt-outs of marketing programs; and records related to data subject rights requests.

Some of the Personal Information in these categories may be considered “Sensitive Person Information” or “Personal Data” in some jurisdictions.

Sources of Personal Information

YSP may collect Personal Information about you from various sources, depending on our relationship and interaction with you. These sources may include:

- Your financial institutions, payment card issuer, merchants, acquirers, and other partners when you use a product issued by a YSP client, or where YSP acts as a program manager and distributor of products issued by a client or partner, or when we’re acting on their behalf, such as when you use the payment card;
- You, such as when you enroll in card or account related programs from YSP or a co-promotion partner, and use card management or account management portals linked to your card or account, or provide survey responses to us;
- Your computer or devices when you interact with our platforms, websites, and applications or through other automatic technologies, such as when we record calls to our Call Centre and use CCTV cameras in our offices; and

- Other third parties, including data aggregators, social media companies, and other publicly available sources.

In addition, Professional and Employment Information may be collected from your references and third parties that help us conduct internal investigations and background screenings, and Business Customer Data may be collected from your employer, trade show and conference organizers, and professional services companies.

Why We Collect Personal Information and How We Use It

Purpose for Collecting and Sharing	Categories of Personal Information	Legal Basis for Processing (Where required under applicable law)
Operate YSP payment activities that enable your payment card or remittance transactions (including authorization, clearing, and settlement of transactions and tokenization) and for related purposes, such as authentication, dispute resolution, fraud prevention, and security	<ul style="list-style-type: none"> • Contact Information • Transaction and Financial Information • Relationship Information • Interaction Information • Biometric Identifiers • Business Customer Data • Inferred and Derived Information • Online and Technical Information • Audio and Visual Information • Government Issued Identification Numbers • Geolocation Information • Compliance Data 	<ul style="list-style-type: none"> • To fulfil the contracted terms and conditions to which you are a party or as needed to fulfil a contract between you and a merchant or between you and the financial institution or other entity that issued your card, where YSP is providing payment services or acting as a data processor • To comply with the laws and regulations that are applicable to us around the world • For the purposes of our own legitimate interests or for the legitimate interests of others, such as to protect you, us, or others from threats (such as security threats or fraud); to enable or administer our business, such as for quality control, compliance, consolidated reporting, and customer service; to manage corporate transactions, such as mergers or acquisitions; and to understand and improve our business or customer relationships generally
Provide services to YSP clients, for example, if you enroll in a card issuer or merchant loyalty program, we will process Card Transaction Data to calculate your rewards and provide targeted offers to you from the YSP client	<ul style="list-style-type: none"> • Contact Information • Transaction and Financial Information • Relationship Information • Interaction Information • Biometric Identifiers • Business Customer Data • Inferred and Derived Information • Online and Technical Information • Audio and Visual Information • Government Issued Identification Numbers • Geolocation Information • Compliance Data 	<ul style="list-style-type: none"> • To fulfil a contract to which you are a party, as described above • To comply with the laws and regulations that are applicable to us around the world • For the purposes of our own legitimate interests or for the legitimate interests of others, as described above
Administer surveys, loyalty programs, contests, and events	<ul style="list-style-type: none"> • Contact Information • Transaction and Financial Information • Relationship Information • Interaction Information • Biometric Identifiers • Business Customer Data • Inferred and Derived Information • Online and Technical Information • Audio and Visual Information • Government Issued Identification Numbers • Geolocation Information • Compliance Data 	<ul style="list-style-type: none"> • To fulfil a contract to which you are a party, as described above • For the purposes of our own legitimate interests or for the legitimate interests of others, as described above

Purpose for Collecting and Sharing	Categories of Personal Information	Legal Basis for Processing (Where required under applicable law)
Based on your marketing contact choices, deliver marketing communications, personalized offers, and interest-based ads to you	<ul style="list-style-type: none"> • Contact Information • Transaction and Financial Information • Relationship Information • Interaction Information • Biometric Identifiers • Business Customer Data • Inferred and Derived Information • Online and Technical Information • Audio and Visual Information • Geolocation Information • Compliance Data 	<ul style="list-style-type: none"> • For the purposes of our own legitimate interests or for the legitimate interests of others, such as to send you news and offers that are relevant to you
Fulfill, develop, or maintain our business relationship with you and/or your company	<ul style="list-style-type: none"> • Contact Information • Transaction and Financial Information • Relationship Information • Interaction Information • Biometric Identifiers • Business Customer Data • Inferred and Derived Information • Online and Technical Information • Audio and Visual Information • Government Issued Identification Numbers • Geolocation Information • Compliance Data 	<ul style="list-style-type: none"> • To fulfil a contract to which you are a party, as described above • For the purposes of our own legitimate interests or for the legitimate interests of others, as described above
Facilitate your employment or contracting relationship with us or evaluate you for a position, including typical human resources purposes, risk management, and compliance	<ul style="list-style-type: none"> • Contact Information • Relationship Information • Interaction Information • Biometric Identifiers • Online and Technical Information • Audio and Visual Information • Government Issued Identification Numbers • Professional and Employment Information • Compliance Data 	<ul style="list-style-type: none"> • To fulfil a contract to which you are a party, as described above • To comply with the laws and regulations that are applicable to us around the world • For the purposes of our own legitimate interests or for the legitimate interests of others, as described above
<p>Understand how you and others use our products, for analytics and modeling and to create business intelligence and insights and to understand economic trends</p> <p>Generate de-personalized, de-identified, anonymized, or aggregated datasets, which are used for product development and delivery of consulting services to clients</p>	<ul style="list-style-type: none"> • While certain information such as Transaction and Financial Information, Relationship Information, Interaction Information, Online and Technical Information, and Geolocation Information may be used for these activities, the result does not constitute Personal Information. 	<ul style="list-style-type: none"> • For the purposes of our own legitimate interests or for the legitimate interests of others, as described above
Support YSP client, customer and operational business activities, such as for account management, quality control, website administration, business continuity and disaster recovery, security and fraud prevention, corporate governance, reporting and legal compliance, analytics and research, enforcement of contracts and other contract management, and the provision of requested products and services	<ul style="list-style-type: none"> • Contact Information • Transaction and Financial Information • Relationship Information • Interaction Information • Business Customer Data • Inferred and Derived Information • Online and Technical Information • Audio and Visual Information • Government Issued Identification Numbers • Geolocation Information • Professional and Employment Information • Compliance Information 	<ul style="list-style-type: none"> • To fulfil a contract to which you are a party, as described above • To comply with the laws and regulations that are applicable to us around the world • For the purposes of our own legitimate interests or for the legitimate interests of others, as described above

Where applicable, we also may process Personal Information with your consent. For example, we may rely on your consent, where required by law, to provide you with marketing communications.

Personal Information is used by YSP in our typical business operations, which include:

- To provide the information, product, or service requested by the individual or as reasonably expected given the context in which with the Personal Information was collected (such as customer credentialing, providing customer service, personalization and preference management, providing product updates, bug fixes or recalls, and dispute resolution);
- For identity and credential management, including identity verification and authentication, and system and technology administration;
- To protect the security and integrity of systems, networks, applications, and data, including detecting, analyzing, and resolving security threats, and collaborating with cybersecurity centers, and law enforcement about imminent threats;
- For fraud detection and prevention;
- For legal and regulatory compliance, including all uses and disclosures of Personal Information that are required by law or reasonably needed for compliance with company policies and procedures, such as anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines;
- For corporate audit, analysis, and reporting;
- To enforce our contracts and to protect against injury, theft, legal liability, fraud, or abuse, and to protect people or property, including physical security programs;
- To de-identify, depersonalize, or anonymize the data or create aggregated datasets, such as for consolidating reporting, research, or analytics;
- To make back-up copies for business continuity and disaster recovery purposes; and
- For corporate governance, including mergers, acquisitions, and divestitures.

Your Privacy Rights

We respect your rights to access, correct and delete your information in accordance with applicable laws. If you have an online account with YSP, you can log into your account to access, update, and delete your information. You can also submit requests under relevant laws to us by emailing ERCOfficer@yalamanchili.in.

For security reasons and to prevent unauthorized disclosure of Personal Information, cardholders should contact their payment card issuers to access their relevant information. This helps ensure that access to the information is only provided to the authorized individuals, subject to the issuer's verification processes. Additionally, if you have questions about how your issuer or merchants handle your Personal Information, please check the privacy notices provided by these companies and contact them directly for assistance with

any privacy requests. When YSP acts as a service provider (also called a data processor) for our clients, we only process your information as instructed by our client to provide the services and for other appropriate purposes, such as recordkeeping and compliance. We rely on our clients to provide you with appropriate privacy notices and to manage your privacy rights.

Supplemental Privacy Notices: YSP operates and supports banks and financial service companies globally. Where YSP is a program manager, specific privacy notices for that country apply. These notices are available below.

International Personal Data Storage, Transfers and Access

YSP is headquartered in Singapore with a number of entities servicing our clients and their customers around the world. We comply with the laws and regulations relating to Personal information in each country in which we operate. Your Personal Information is not stored, transferred or accessed outside the country of its origination, unless permitted by local laws and regulations. In such cases your explicit consent will be obtained.

We will always protect your Personal Information as described in this Global Privacy Notice, any Supplemental Privacy Notices for specific countries and in the product terms and conditions.

Securing and Storing Personal Information

We use physical, technical, organizational, and administrative safeguards to help protect your Personal Information from unauthorized access or loss. For example, we use encryption and other tools to protect sensitive information. We retain your Personal Information as needed for the purposes listed above and as permitted by law.

Job Applications

If you have applied for a job at YSP, the Personal Information in your application will be used and retained for recruiting, regulatory compliance, and other typical human resources process purposes. This may include processing information to monitor the progress of employee recruitment.

Children's Information

In general, YSPs online platforms, products and services are not intended for, directed to or likely to be accessed by children. If the product or service is intended for children, YSP only collects information from children as permitted by applicable law. If you believe that YSP are processing a child's information inappropriately, please e-mail ERCOfficer@yalamanchili.in.

Changes to this Global Privacy Notice

We may update this Privacy Notice from time to time. We will post an alert online if the changes are material. If the changes will materially affect the way we use Personal Information that we have already collected, we will notify you directly using the contact information you have provided.

How to Contact Us

If you would like to exercise your privacy rights under relevant laws, please reach out to us via email, ERCOfficer@yalamanchili.in.

For any other assistance you may contact us, including any queries to the applicable Data Protection Officers within YSP, at the information below:

Email us: ERCOfficer@yalamanchili.in.

Please do not include sensitive information, such as your account number, in emails.

Mail us a letter:

Ethics, Risk and Compliance – Privacy Officer
Yalamanchili International Pte Limited
26 Sin Ming Lane, #05-121 Midview City
Singapore 573971