

# Centtrip

## Privacy Policy

Last updated: 21 November 2024

Centtrip Limited and our group companies (referred to in this Notice as "Centtrip", "we", "us" or "our") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice applies to personal information that we collect through our website at [www.centtrip.com](http://www.centtrip.com) ("Website"), over the phone and in our app ("App") or otherwise in our dealings with corporate entities and associated individuals when Centtrip acts as a data controller.

It is important to us that your personal data is handled carefully, and that you are well informed about the way we process it.

If you have any questions or concerns about our use of your personal information, please contact us using the details provided at the end of this Privacy Notice. Centtrip reserves the right to update this Privacy Notice at any time. Such updates will be made and posted on our Website – [www.centtrip.com](http://www.centtrip.com).

### Who is Centtrip?

Centtrip is a payment technology company operating as an electronic money institution in the UK. Centtrip provides its customers with payments, corporate prepaid cards and foreign exchange services. Centtrip Limited is regulated by the Financial Conduct Authority in the UK.

### What personal information does Centtrip collect and why?

The table below provides a summary of the categories of personal data that we collect and disclose to service providers and other third parties.

Categories of personal data that Centtrip collects	Examples of personal data that Centtrip collects	When and why does Centtrip collect this information?	What kind of third parties we disclose to, and for what business purpose?
Know Your Customer (KYC) information	Name, date of birth, bank account number, tax id number, nationality, passport number, job title.	When you apply and sign up for Centtrip services. Centtrip is legally obliged to collect this information.	Centtrip discloses this information to identity and verification screening partners. Centtrip may disclose this information to payment providers, banking partners and other third-party service providers.

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Business information	Your name, business email, phone number, company name, and website	When you complete our online application form and when we communicate with you. Centtrip collects this information for marketing purposes, and for providing our products and services.	Centtrip discloses this information with marketing and customer relationship service providers.
Customer financial information	Name, bank account numbers	When you complete the online application form and load funds onto your Centtrip account.	Centtrip discloses this information with card programme providers and law enforcement agencies in compliance with legal orders.
Transaction information	Payer details, transaction amount, date, time and description	When you use your Centtrip account to purchase goods or services. Centtrip collects this information for the purposes of providing our products and services.	Centtrip discloses this information to our customers in the Platform and/or the App and to selected banking, card and payment service providers upon request. Centtrip may disclose this information to regulatory authorities upon request or for mandated reporting.
Internet or similar network activity	Cookies	When you visit Centtrip's Website. Centtrip collects this information for marketing purposes.	Centtrip discloses this information to IT providers, advertising and marketing providers for its own advertising purposes.
Sensitive personal information (as defined in United States' privacy laws)	Identification document e.g. driver's licence or passport Adverse media e.g. details of records/convictions	When you sign up for Centtrip services. Centtrip is legally obliged to collect this information.	Centtrip discloses this information to identity verification providers, to tax and regulatory authorities upon request or for mandated reporting.

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Centtrip reserves the right to use de-identified or aggregated data for any purpose without limitation and will not attempt to re-identify the information.

We will only keep your data for as long as we reasonably need to for the purposes listed above, or as otherwise required by law.

The personal information that we may collect about you broadly falls into the following categories:

- **Applications and Onboarding**

- **Information provided by or in relation to our corporate clients**

As part of onboarding, if a corporate client applies for an account with us, we may collect certain personal information to verify the identity of its shareholders, directors or other associated individuals to open and manage an account with us. In certain situations, it may also be necessary for Centtrip to obtain additional information about individuals and/or entities who will benefit indirectly from the services and products that we provide to our clients. For example, Marine Clients that use our products to manage operational expenditure that is directly associated with specific vessels or yachts will need to disclose details about the ultimate beneficial owner (UBO) of the yacht or vessel before they are provided with a dedicated operating account.

- **Information that we obtain from third party sources**

We use third party providers for verification purposes only and may receive personal information about you from these third parties (including credit agencies) but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

Centtrip uses a credit rating agency for verification purposes only to verify the identity, age and residency of individuals, to detect and track fraud and to combat money laundering. Centtrip uses GBG for conducting the identity verification of natural persons. More information about GBG's ID verification service and its Privacy Notice can be accessed at the following links:

[ID3global ID Verification Service | GBG Identity](#)

[Privacy Notice | GBG](#)

Centtrip relies on Orbis for screening and verifying corporate entities, their ownership structures (including directors and beneficial owners), and vessel data. The Product Privacy Policy related to Orbis can be found here:

[Product Privacy Policy | Bureau van Dijk](#)

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Centtrip employs RDC Grid to identify and manage risks related to money laundering, fraud, corruption, terrorism, organised crime, and other threats. The Product Privacy Policy related to RDC Grid can be found here:

[RDC Product Privacy Notice | Bureau van Dijk](#)

- **Customer services:**

- **Information that you provide voluntarily**

When you contact our Customer Support team by phone (please note that calls may be recorded for security, training and monitoring purposes) or email, we may collect certain personal information to verify your identity and answer any queries you may have about your Centtrip account. This may include full name, contact details, identification documents, call recordings, recent transactions, Centtrip account number, address details, Centtrip originated one time only codes and financial information.

- **Using our Website or App:**

- **Information that you provide voluntarily**

When you send us an email or visit our Website or App, we may collect personal information volunteered by you: for example, we may ask you to provide your contact details in order to register and manage a Centtrip account with us, to subscribe to marketing communications from us, to submit enquiries to us and/or provide services you have requested. We may also use your personal information to provide account related information and product and services updates and reports. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

- **Information that we collect automatically**

When you visit our Website or App, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information to enable users to access the

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Website, for internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

- o **Information that we obtain from third party sources**

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include Merchant Category Code (MCC) location data and we use the information we receive from these third parties to maintain and improve the accuracy of the records we hold about you or for mapping of card transaction information in the App.

- **Statistical reports:**

- o We may also use the information collected to prepare high level anonymised statistical reports, which contain details such as the average number of company directors being authorised signatories to a company's accounts. The information in these reports is never personal and you will never be identifiable from them. We may share these statistical and anonymised reports with third parties.

## Who does Centtrip share your personal information with?

We may disclose your personal information to the following categories of recipients:

- to our group companies for internal administrative purposes (for example, ensuring consistent and coherent delivery of our services to our customers, corporate strategy, compliance, auditing and monitoring, research and development and quality assurance);
- to our third-party providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website and platform, assist with identity verification and KYC purposes);
- to our service providers and sub-contractors, including but not limited to payment processors, foreign exchange, banking and compliance providers for the fulfilment of financial transactions, suppliers of technical and support services, insurers, logistic providers, cloud service providers and card providers. This includes:

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For UK cardholders, Centtrip processes personal data on behalf of PFSL (Prepaid Financial Services Limited) and follows PFSL's instructions to perform electronic Know Your Customer (eKYC). The Privacy Notice of PFSL can be found here:

[PFSL Privacy Information Notice](#)

For EU, UK and USA cardholders, Centtrip processes personal data on behalf of Adyen and follows Adyen's instructions to perform electronic Know Your Customer (eKYC). Adyen's Privacy Policy can be found here:

[Adyen Privacy Statement](#)

- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to companies that assist us in our marketing, advertising and promotional activities;
- to analytics and search engine providers that assist us in the improvement and optimisation of our website; and
- to any other person with your consent to the disclosure.

Any third parties with whom we share your personal information are limited (by law and contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this Privacy Notice and applicable laws.

## Legal basis for processing personal information

Our legal basis for collecting and using the personal information as set out in this Privacy Notice are as follows:

- (1) our use of your personal information is necessary to perform our or a third party's obligations under any contract with you (for example, to provide services to you, to fulfil an order which you place with us or a third party, to comply with the terms of use of our Website which you accept by browsing our Website and/or to comply with our contract to provide services to or receive services from you or your employer); or

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- (2) our use of your personal information is necessary for complying with our legal obligations (for example, complying with our regulatory obligations to the Financial Conduct Authority); or
- (3) where neither (1) or (2) apply, our use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our Website). Our legitimate interests are to:
  - a. run, grow and develop our business;
  - b. operate our Website;
  - c. select appropriately skilled and qualified suppliers;
  - d. conduct marketing, market research and business development;
  - e. provide efficient and effective services to our customers, make and receive payments and provide customer services;
  - f. place, track and ensure fulfilment of orders with our suppliers; and
  - g. for internal group administrative purposes.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

- (4) Where you have provided a personal email address to us, we may process your personal information in some cases for marketing purposes on the basis of your consent. If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at [help@centtrip.com](mailto:help@centtrip.com) and we will stop doing so.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

## Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see "Centtrip Cookie Policy" at <https://www.centtrip.com/privacy-terms>

## How does Centtrip keep my personal information secure?

We are committed to securing your personal data and we have implemented appropriate technical and organisational measures to protect the personal information that we collect and process about you. We:

- (a) have suitable and effective information security policies and procedures that are essential to complying with relevant regulations;

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- (b) undergo independent verification of our security and compliance controls. Our current information security third-party independent audits include but are not limited to, the Payment Card Information Data Security Standard (PCI-DSS) and penetration testing;
- (c) restrict administrative access of our production environment to approved personnel. Access rights and levels are based on employee function and role and are based on the security concepts of 'least privilege' and 'need-to-know' to ensure access privileges are matched with defined responsibilities. Administrator access is limited to a small number of employees, and this is regularly audited;
- (d) have implemented encrypt email data and in transmission with APIs over the internet. This includes ESET security with software and windows firewalls activated and all emails are scanned using Mimecast and if applicable, Zivver;
- (e) have installed anti-virus software on all machines, using ESET business security software and continual scans for malware are carried out;
- (f) have developed an incident management process for security events that may impact the confidentiality, integrity, or availability of our systems or data. The process includes defined response times for Centtrip to notify relevant parties. The process specifies courses of action, procedures for notification, escalation, mitigation, and documentation;
- (g) have implemented controls at our physical offices to prevent unauthorised physical access. This includes a 24hrs concierge service, mandatory visitor sign-in and video surveillance; and
- (h) have industry-standard secure network architecture in place for our platform and app.

## Marketing

We may collect and use your personal information for undertaking marketing by email, telephone and post. We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes. However, we will always obtain your consent to direct marketing communications where we are required to do so by law (for example, if you have provided a personal email address to us) and if we intend to disclose your personal information to any third party for such marketing.

If you wish to stop receiving marketing communications, you can contact us by email at [help@centtrip.com](mailto:help@centtrip.com) at any time.

## International data transfers

Your personal information may be disclosed to other Centtrip group companies, this includes but is not limited to, Centtrip B.V. which is located in the Netherlands and Centtrip Inc which is located in the United States.



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To protect your data when your information is transferred outside the European Economic Area (EEA), we have implemented appropriate safeguards which includes standard contractual clauses.

Specifically, our websites, web and app platform servers are located exclusively in the EEA and the majority of our third-party service providers and partners also operate in the UK and EEA.

## Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights. For fraud or money laundering risk, your data can be held for up to six years.

## Your data protection rights

You have certain rights in relation to your personal information. You have the following data protection rights, subject to certain exceptions:

- **Right to access.** You have a right of access to any personal information we have collected about you in a portable and (where technically possible) usable format.
- **Right to know.** You may have the right to verify that we have collected personal data about you, as well as know what personal data we have collected about you. This includes, as applicable, the categories of personal data we have collected, the sources from which we collected the personal data, the business or commercial purposes for which we collected that personal data, the categories of personal data disclosed to third parties for business purposes and the categories of third parties to whom we disclosed personal data.
- **Right to update or correct your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.
- **Right to delete your information.** You may be entitled to request that we delete the personal data that we have collected about you. We will use all commercial reasonable efforts to honour your request, in compliance with applicable laws. Please note,

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however, that we may need or be required to keep such information, such as for our legitimate business purposes, or to comply with applicable laws.

- **Right to restrict use of your information.** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances.
- **Right to stop marketing.** You have a right to ask us to stop using your personal information for marketing purposes. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the "How to contact us" heading below.
- **Right to data portability.** You have a right to ask us to provide your personal information to a third-party provider of services. This right only applies where we use your personal information on the basis of your consent or performance of a contract and where our use of your information is carried out by automated means.
- **Right to object.** You are entitled to object to us to processing your personal information. In addition, where you have given your consent for us to process personal data, you can withdraw this consent at any time. Please note, that Centtrip maintains a record of withdrawals of consent to ensure that we do not contact you in the future.
- **Right to complain.** You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.
- **Right to exercise rights without discrimination.** You have the right not to receive discriminatory treatment if you exercise the rights conferred to you by applicable privacy laws.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. As part of this process, we will provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exception applies, we will tell you this when responding to your request. We may request that you provide us with information necessary to confirm your identity before responding to any request you make.

## Third-party websites

Our Website may also contain links to third-party websites. These third-party sites may provide additional information, goods, services and/or promotions. These sites are owned

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and operated independently from us and have their own privacy and data collection practices. Any personal information you provide to these websites will be governed under the terms of their privacy policy.

## Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the last updated date displayed at the top of this Privacy Notice.

## How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following contact details:

Email: [privacy@centtrip.com](mailto:privacy@centtrip.com)

Address: Centtrip Ltd, 9 Noel Street, London W1F 8GQ, UK.

The data controller of your personal information is Centtrip Limited.