



Privacy Policy for PayPal Services

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This Privacy Policy applies to all European Union countries except Austria, Belgium, France, Germany, Italy, Netherlands, Poland, Spain and the Vatican City.

Please view [download and save](#) this policy.

The Privacy Policy below governs your PayPal account and any information you provide on this site or our products, services or any other feature, technologies or functionalities offered by us on our website or through any other means (collectively "the PayPal Services").

1. Overview

In order to operate the PayPal Services and to reduce the risk of fraud, PayPal (Europe) S.à r.l. & Cie, S.C.A. ("PayPal" or "we"), the data controller, must ask you to provide us information about yourself and your credit or debit card and/or bank account. By consenting to, and agreeing the terms of, the Privacy Policy, you also expressly consent and agree to us processing your data in the manner set out in the Privacy Policy. This Privacy Policy describes the information we collect and how we use that information. PayPal takes the privacy of your personal information very seriously and will use your information only in accordance with the terms of this Privacy Policy. We will not sell or rent your personally identifiable information or a list of our customers to third parties. However, in order for us to offer our services to our users; to enhance the quality of its service from time to time; and to protect the interests of our users, we will in limited circumstances and as further described in more detail throughout this policy, share some of your information with third parties under strict restrictions. It is important for you to review this Privacy Policy. This Privacy Policy applies to all services that are hosted on the PayPal website or by other means.

By accepting the Privacy Policy and User Agreement in registration, you expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the PayPal User Agreement.

If you disagree with the terms of Privacy Policy, please do not register for nor use the PayPal service.

Notification of Changes

We may at any time amend, delete or add to this Privacy Policy (a "Change") by giving notice of such Change by posting a revised version of this Privacy Policy on the PayPal website(s). A Change will be made unilaterally by us and you will be deemed to have accepted the Change after you have received notice of it. We will give you 2 months' notice of any Change with the Change taking effect once the 2 month notice period has passed, except the 2 month notice period will not apply where a Change relates to the addition of a new service, extra functionality to the existing Services or any other change which we believe in our reasonable opinion to neither reduce your rights nor increase your responsibilities. In such instances, the Change will be made without prior notice to you and shall be effective immediately upon giving notice of it.

If you do not accept any Change, you must close your PayPal account following the account closure procedure set out in section 7.1 of the User Agreement. If you do not object to a Change by closing your PayPal account within the 2 month notice period, you will be deemed to have accepted it. While you may close your PayPal account at any time and without charge, please note that you may still be liable to us after you close your PayPal account for any liabilities you may have incurred and are responsible for prior to close your PayPal account and please further note our rights under section 10.3 (Account closure and limited access) of the User Agreement.

Some pages on the PayPal website include links to third party websites. These sites are governed by their own privacy statements, and PayPal is not responsible for their operations, including but not limited to their information practices. Users submitting information to or through these third party websites should review the privacy statement of these sites before providing them with personally identifiable information.

A Special Note About Children. Children are not eligible to use our service and we ask that minors (under the age of 18) do not submit any personal information to us or use the service.

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2. Binding Corporate Rules

In addition to the privacy practices set out in this Privacy Policy, eBay Inc., the parent company of PayPal, has established a set of Corporate Rules (also referred to as Binding Corporate Rules), approved by a number of European Union privacy regulators. These Corporate Rules are a commitment by eBay Inc. to adequately protect your personal information regardless of where the data resides, and

depending upon your location, may provide additional privacy rights through your privacy regulator or a court. If you would like additional information regarding the Corporate Rules or contact us via the contact details below.

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3. Information We Collect

Required Information

To open a PayPal account or use the PayPal Services, you must provide your name, address, phone number, and email address. In order to make certain payments through PayPal Services, you must provide credit card, debit card or bank account information. We also ask you to choose two different security questions to answer (such as your city of birth or your pet's name). This required information is necessary for us to process transactions, issue a new password if you forget or lose your password, protect you against credit card fraud and current account fraud, and to contact you should the need arise in administering your account.

We will also require other commercial and/or identification information if you send or receive certain high-value transactions or high overall payment volumes through PayPal Services or as is otherwise required in order for us to comply with our anti-money laundering obligations.

Transaction Information

When you use PayPal Services to send money to someone else or request money from someone else, we ask you to provide information related to each transaction, consisting of the amount of the transaction, the type of transaction (purchase of goods, purchase of services, or simple money transfer and the email address, Skype ID (if applicable) or phone number of the third party). Also, when you send money to another PayPal customer, you may be asked to provide personal details to that customer to complete the transaction. Those details may also be passed on to us from that customer. We retain this information for each of your transactions through PayPal and may add this information to your account profile to be used for future transactions that you may make with us. We also collect the Internet address (IP address) and other identifying information about the computer or device you use to access your PayPal account or use PayPal Services, in order to help detect possible instances of unauthorised transactions.

Information About You From Third Parties

In order to protect all our customers against potential fraud, we verify the information you provide with bank processors listed in the table under the section "Disclosure to Third Parties Other than PayPal Customers" below. In the course of such verification, we receive personally identifiable information about you from such services. In particular, if you register a credit card or debit card with PayPal, we will use card authorisation and fraud screening services to verify that your card information and address match the information that you supplied to PayPal, and that the card has not been reported as lost or stolen.

If you send or receive high overall payment volumes through PayPal, in some circumstances we will conduct a background check on your business by obtaining information about you and your business from a credit bureau or a business information service such as Dun & Bradstreet, as listed in the table under the section entitled, "Disclosure to Third Parties Other than PayPal Customers" below. If you owe us money, we will generally conduct a credit check on you by obtaining additional information about you from a credit bureau, to the extent permitted by law. PayPal, at its sole discretion, also reserves the right periodically to retrieve and review a business and/or consumer credit report supplied by such credit bureau for any account, and reserves the right to close an account based on information obtained during this credit review process.

We may also collect information from members of the eBay Inc. corporate family or other companies.

Additional Verification

If we cannot verify the information that you provide, or if you request a withdrawal by cheque to an address other than your verified credit card billing address, we ask you to send us additional information by fax (such as your driving licence, credit card statement, and/or a recent utility bill or other information linking you to the applicable address), or to answer additional questions online to help verify your information.

Website Traffic Information

Because of the way that World Wide Web communication standards work, when you arrive at or leave the PayPal website, we automatically receive the web address of the site that you came from or are going to. We also collect information on which pages of our website you visit while you are on the PayPal site, IP addresses, the type of browser you use and the times you access our website. We use this information to try to understand our customers' preferences better and to manage the load on our servers, so as to improve our service and your experience with PayPal.

Our Use of "Cookies"

"Cookies" are small files of data that reside on your computer and allow us to recognise you as a PayPal customer if you return to the PayPal site using the same computer and browser. We send a "session cookie" to your computer if and when you log in to your PayPal account by entering your email address and password or otherwise use the PayPal Services. These cookies allow us to recognise you if you visit multiple pages in our site during the same session, so that you don't need to re-enter your password multiple times. Once you log out or close your browser, these session cookies expire and no longer have any effect.

We also use longer-lasting cookies for other purposes such as to display your email address on our sign-in form, so that you don't have to retype the email address each time when you log in to your PayPal account. We encode our cookies so that only we can interpret the information stored in them. You are free to decline our cookies if your browser permits, but doing so may interfere with your use of our website. We may also collect information about your computer or other access device to mitigate risk and for fraud prevention purposes.

We also use cookies to customise the PayPal Services, content, and advertising; measure promotional effectiveness, and promote trust and safety.

You may encounter cookies from third parties when using the PayPal Services on websites we do not control (for example, if you view a web page created by a third-party or use an application developed by a third-party, there may be a cookie placed by that web page or application).

Customer Service Correspondence

If you send us correspondence, including emails and faxes, we retain such information in the records of your account. We will also retain

customer service correspondence and other correspondence from PayPal to you. We retain these records in order to keep records of our relationship, to measure and improve our customer service, and to investigate potential fraud and violations of our User Agreement. We may, over time, delete these records if permitted by law.

Questionnaires, Surveys and Profile Data

From time to time, we offer optional questionnaires and surveys to our users for such purposes as collecting demographic information or assessing users' interests and needs. The use of the information collected will be explained in detail in the survey itself. If we collect personally identifiable information from our users in these questionnaires and surveys, the users will be given notice of how the information will be used prior to their participation in the survey or questionnaire.

Non-member Recipients and Requests

When a member either sends a payment to, or requests a payment from, an individual who is not a registered member of PayPal, we will retain the information that the member submits to us, including, for example, the other party's email address, Skype ID (if applicable), phone number and/or name, for the benefit of the member who is attempting to contact the non-member, so that the member can see a complete record of his or her transactions, including uncompleted transactions. Although this information is stored indefinitely, we will not market to the non-member in any way at any time. Additionally, these non-members have the same rights to access and correct information about themselves (assuming that their detail(s) were correct enough to reach them) as anyone else who uses PayPal.

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4. Our Use and Disclosure of Information

Internal Uses

We collect, store and process your personal information on servers located in the United States and operated by our parent company, PayPal Inc and elsewhere in the World where PayPal facilities are located. Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, and customised experience. You agree that we may use your personal information to:

- provide the services and customer support you request;
- resolve disputes, collect fees, and troubleshoot problems;
- prevent potentially prohibited or illegal activities, and enforce our User Agreement;
- customise, measure, and improve our services and the content and layout of our website;
- deliver targeted marketing, service updates, and promotional offers based on the communication preferences you have defined for your PayPal account (please refer to the section Our contacts with PayPal customers below);
- compare information for accuracy, and verify it with third parties.

Marketing

We may combine your information with information we collect from other companies and use it to improve and personalise the PayPal Services, content and advertising. If you don't wish to receive marketing communications from us or participate in our ad-customisation programs, simply indicate your preference by logging into your account and going to the Profile subtab under the My Account tab and adjusting your preferences under Account Information, or by following the directions provided with the communication or advertisement.

Disclosure to Other PayPal Customers

If you are a registered PayPal user, your name, e-mail address, Skype ID (if applicable), phone number (if applicable) date of sign-up, the number of payments you have received from verified PayPal users, and whether you have been verified to have control of a bank account are made available to other PayPal customers whom you have paid or who are attempting to pay you through PayPal. If you are a Business account holder, we will also display to other PayPal customers the Web site address (URL) and customer service contact information that you provide us. In addition, this and other information may also be shared with third parties when you use these third parties to access the PayPal Services. However, your credit card number, bank account and other financial information will not be revealed to anyone whom you have paid or who has paid you through PayPal or third parties that use PayPal Services, except with your express permission or if we are required to do so pursuant to credit card rules, a court order or other legal process. If you are buying goods or services and pay through PayPal, we may provide the seller with the shipping address for the goods and your billing address to complete your transaction with the seller. If an attempt to pay your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful payment. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

We work with third parties, including merchants to enable them to accept or facilitate payments from or to you using PayPal. In doing so, a third party may share information about you with us such as your email address or mobile number, when a payment is sent to you or when you are attempting to pay that merchant or through that third party. We use this information to confirm that you are a PayPal customer and that PayPal can be enabled as a form of payment, or, where a payment is sent to you, to send you a notification that you have received a payment. Also, if you request that we validate your status as a PayPal customer with a third party, we will do so. Please note that merchants you buy from and contract with have their privacy policies, and PayPal may not be held responsible for their operations, including, but not limited to, their information practices.

By accepting this Privacy Policy, you expressly agree that each time you pay or attempt to pay another PayPal customer or a third party merchant by using your PayPal account, PayPal may then transfer the aforementioned relevant data to the other PayPal customer or to the third party merchant, who may be located outside the European Union, in order to process, execute or otherwise deal and provide information about the payment.

If you open a PayPal account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly through PayPal Services) will be shared with the owner of the third party website or application and your information may be subject to their privacy policies.

Disclosure to Third Parties Other Than PayPal Customers

PayPal will not sell or rent any of your personally identifiable information to third parties, and will only disclose this information in the limited

circumstances and for the purposes described in this policy. This includes transfers of data to non-EU member states. Specifically, you consent to and direct PayPal to do any and all of the following:

- a. Disclose information including, without limitation, transaction, account information, personal details and the contents of communications to the police, security forces, competent governmental, intergovernmental or supranational bodies, competent agencies (other than tax related authorities), departments or regulatory, self-regulatory authorities or organisations (including, without limitation, the Agencies set out in the table under the heading "Agencies" below) or other third parties that we in good faith believe is appropriate to cooperate in investigations of fraud or other illegal activity or potential illegal activity, or to conduct investigations of violations of our User Agreement. If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies and law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering. Please contact us on the details set out at the end of this privacy policy if you want to receive further details of the relevant fraud prevention agencies. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.
- b. Disclose information in response to requirements of credit card rules, civil or criminal legal process.
- c. Disclose information to the "Category" of third parties listed in the table below. The purpose of this disclosure is to allow us to provide our service to you. We also set out in the table below, under each "Category", non-exclusive examples of the actual third parties we currently disclose your account information, together with the purpose of doing so, and the actual information we disclose (these third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information was shared).

Category	Party Name and jurisdiction (in brackets)	Purpose	Data disclosed
Payment processors			
	HSBC Bank Plc (UK, Ireland), HSBC Merchant Services LLP (UK), Bank of America (UK, USA, Italy and India), Discover Financial Services (USA), JPMorgan Chase Bank (United Kingdom, USA), BNP Paribas (France), Netgiro (Sweden), StarFinanz (Germany), Wells Fargo (Ireland, USA), American Express (USA), National Westminster Bank PLC (UK), OmniPay Limited (Ireland), Australia and New Zealand Banking Group Limited (Australia), ANZ National Bank Limited (New Zealand) and Transaction Network Services (UK) Limited (UK)	To allow payment processing settlement services, fraud checking.	Name, address, details of user funding instruments, details of payment transactions
	Deutsche Bank AG (Germany, Netherlands, France, Spain)	To allow the processing of direct debits in Germany, Netherlands, France and Spain.	Name, date of transaction, amount, currency and user's bank account information.
	Royal Bank of Scotland plc (United Kingdom) ("RBS")	To allow payment processing and dispute handling for transactions of PayPal users when those users transact with a merchant who uses the PayPal service via the RBS service.	All account information except details of user financial instruments
Audit			
	PricewaterhouseCoopers Sàrl (Luxembourg)	To test PayPal's Anti Money Laundering (AML) & Know Your Customer (KYC) controls.	For a sample of individual client accounts: name, PayPal account number (Customer ID), total amount received on the PayPal account, total amount sent from the PayPal account, type of PayPal account, and, as the case may be, any other relevant account information.
Customer Service Outsourcing			
	Sutherland Global Services Inc. (USA and Philippines), Sitel GmbH (Germany), Transcom Worldwide SAS (France, Tunisia), Competence Call Center Leipzig GmbH (Germany) and Convergys Customer Management Group Inc. (UK)	To allow telephone and e-mail customer support services	Name, address, telephone number, email addresses, truncated and limited or full funding source information (case dependent), funding source expiration dates, type of PayPal account, proof of identity, account balance and transaction information, customer

		statements and reports, account correspondence, shipping information, promotional information.
Nuance Communications, Inc. (USA)	To calibrate and optimise speech recognition performance for telephone customer support services	Recordings of a sample of customer support telephone calls, which may include any or all account information transmitted during the call.
ICT Group Inc. (US)	To perform and facilitate telephone customer support.	Name, address, phone number, PayPal account number.
Credit Reference and Fraud Agencies		
Callcredit plc., Experian Limited and Dun & Bradstreet Limited (UK), CIFAS (UK), CRIF (Italy), Cerved B.I (Italy), Coface (France), Synectics Solutions Limited, Equifax Ltd (UK), Equifax Plc (UK), MCL Hunter, GB Group plc (UK), Graydon (UK), iQor Recovery Services Limited (UK), UK Data Limited (UK), ICC Information Limited (UK), Payment Trust Limited (UK), 192.com (UK), 192.com Limited (UK), i-CD Publishing (UK) Limited (UK), Experian Netherlands BV (Netherlands), Experian Bureau de Credito SA (Spain), Informa D&B SA (Spain) and CRIBIS D&B S.r.l. (Italy). Data disclosed to these agencies may be transferred outside of the EU and on a global basis.	To verify identity, make decisions concerning a customer's credit worthiness, carry out checks for the prevention and detection of crime including fraud and/or money laundering, assist in debt recovery, manage PayPal accounts and undertake statistical analysis, undertake research as to appropriateness of new products and services and system checking. Data disclosed may be retained by the applicable credit reference and fraud agency for audit and fraud prevention purposes.	Name, address, date of birth, time at address, telephone number, proof of identity, legal form, time in business, company registration number, VAT number, relevant transaction information (if appropriate)
Scorex (UK) Limited (UK)	To provide a technology solution to allow PayPal to process, send and receive credit information of users via its contracted credit reference agencies.	Name, address, date of birth, time at address, telephone number, legal form, time in business, company registration number, VAT number (if appropriate)
SCHUFA Holding AG (Germany)	To verify identity, carry out checks for the prevention and detection of crime including fraud and/or money laundering To determine credit worthiness of merchants.	Name, address, date of birth, gender, bank account details
CEG Creditreform Consumer GmbH (Germany)	To determine credit worthiness of merchants.	Name, address, date of birth
Creditreform Berlin Wolfram KG (Germany)	To determine credit worthiness of merchants.	Name and address
World-Check (UK)	To verify identity	All account information
ID Checker.nl BV (Netherlands)	To verify identity	All account information and proof of identity.
RSA Security Inc. and RSA Security Ireland Limited	To verify identity	All account information
Bürgel Wirtschaftsinformationen GmbH & Co. KG (Germany)	To verify identity	All account information
Financial Products		
Santander UK Cards Limited (United Kingdom)	To conduct joint marketing campaigns for PayPal Credit, and PayPal Credit Card, risk modelling, enforce terms and conditions for PayPal Credit and PayPal Credit Card	Name, address, e-mail and account information (including, without limitation, account status).

The Royal Bank of Scotland plc (United Kingdom), TSYS Card Tech Limited (United Kingdom), TSYS Managed Services EMEA Limited (United Kingdom), TSYS Systems Services Inc. (USA), PrePay Technologies Limited (trading as PrePay Solutions) (UK)	To conduct joint marketing campaigns for PayPal pre-paid card, risk and fraud modelling, enforce terms and conditions for PayPal prepaid card	Name, address, e-mail, date of birth and account information
Société Générale, La Banque Postale, BNP Paribas and Crédit Mutuel (France)	Billing purposes	Only for merchants using PayPal through the partner's payment solution: merchant ID, number of PayPal transactions, transaction volume with PayPal and, as the case may be, termination of the PayPal account.
Cetelem S.A, Cofidis and Cofinoga S.A. (France)	Registration of the credit card issued by the credit company on the user's PayPal account and processing of funding requests made by the same user.	Name, e-mail address, birth date (as the case may be), credit card number; expiry date, 3 digit Card Security Code (as the case may be) and amount of the funding request and any account information necessary for fraud or dispute resolution.
Commercial Partnerships		
Royal Mail Group Plc. (United Kingdom) and Pitney Bowes Inc. (USA)	To provide automated label printing for sellers using PayPal and eBay to facilitate postal and delivery services, including payment reconciliation services	Name, address, e-mail, postage transaction amount
Trustwave (US)	To provide customised services and assistance to Merchants using PayPal, to facilitate the process of becoming PCI DSS compliant.	Name, e-mail address and PayPal account number
Marketing and public relations		
inContact (USA), Decipher Inc. (USA) and Northstar Research Partners (USA)	To conduct customer service surveys	Name, e-mail address, type of account, type and nature of PayPal services offered or used and relevant transaction information.
Adwise (France) and Axance (France)	To conduct marketing surveys	Name, e-mail address, telephone number, type of account, type and nature of PayPal services offered or used and relevant transaction information.
BD Network Limited and Tullo Marshall Warren Limited (United Kingdom), MyCash (France)	To develop and execute customer promotions	Name, address, e-mail
Salesforce.com (USA)	To store merchant contact information	Name, address, telephone number, e-mail
Noesis srl (Italy) and Lansons Communications (United Kingdom), Text 100 (Spain and Netherlands), Text 100 AB (Sweden) and I&E Consultants (France)	To answer media enquiries regarding customer queries	Name, address, all customer account information relevant to customer queries
Alchemy Worx Ltd (United Kingdom)	To allow management reporting of marketing campaigns.	Name, e-mail address, details of customer campaign interaction.
Carrenza Limited	To store user data for marketing campaigns.	Name, e-mail, address, business name, domain name, account status,

		account preferences, type and nature of PayPal services offered or used and relevant transaction information.
Satmetrix Systems, Inc. (USA)	To conduct customer service surveys	Name, e-mail address, type of account, type and nature of PayPal services offered or used and relevant transaction information.
Acxiom France (France)	To collect additional user information and better target marketing campaigns	Name, e-mail, address and phone number.
Adelanto (France)	To execute marketing campaigns for merchants	Name of the merchant, name of the contact person, e-mail, address, merchant website URL, type and nature of PayPal services offered or used.
Consultix (France and Spain) and Quadro Srl (Italy)	To host information provided by merchants and display part of this information on the pages of the PayPal website listing websites accepting PayPal and proposing special offers to PayPal users.	All information provided by merchants in connection with their use of these pages of the PayPal website (including in particular name of the merchant, name of the contact, email, logo and information relating to the promotion(s) offered to PayPal users).
Operational services		
KSP Kanzlei Dr. Seegers, Dr. Frankenheim & Partner Lawyers (Germany and Austria), NCO Collections Europe Limited, Robinson Way, Intrum Justitia Limited (United Kingdom), IQOR Recovery Services Limited (UK), Compagnie Francaise du Recouvrement (France), EOS Solutions UK Plc (UK), Transcom Worldwide S.A. (UK), Transcom Worldwide (UK) Limited (UK), Newman & Company Limited (UK), Clarity Credit Management Solutions Limited (UK), EOS Deutschland GmbH (Germany), EOS Aremas Belgium SA/NV (Belgium), EOS Nederland B.V. (the Netherlands), Arvato Services Iberia (Spain), Infoscure Iberia (Spain), BFS Risk and Collection GmbH (Germany), Transcom Worldwide (France), SAS (France), Transcom Worldwide S.p.A (Italy), HFG Hanseatische Inkasso-und Factoring-Gesellschaft (Germany)	To collect debt	Name, address, date of birth, telephone number, account number, e-mail, account type, account status, last four digits of financial instruments account, account balance, details of account transactions and liabilities, name of funding source provider.
Digital River Inc. (US) Research in Motion Limited (US)	To enable you to access and use PayPal via a mobile device (for example, mobile phone or PDA)	Applicable details of your account information which are transmitted as part of your use of PayPal via a mobile device.
P K Consultancy Limited (UK)	To assess risk and to help detect and prevent potentially illegal acts and violations of policies.	Name, address, telephone number, account number, e-mail, account type, last four digits of financial instruments account, account balance, details of account transactions and liabilities, account status and account performance information as required for the Purpose.
Yesmail Inc. (USA), Responsys (USA) and Silverpop Systems Inc. (USA)	To fulfil e-mail operations in respect of PayPal services (including, but not limited to,	Name, e-mail, address, business name, business contact details, domain

	operations, customer services, collections, marketing programs and promotions).	name, account status, account type, account preferences, type and nature of PayPal services offered or used and relevant transaction and account information.
Blue Media S.A. (Poland)	To verify identity and ensure that a user is a PayPal account holder. To process instant funding requests made by a user through the Blue Media services	Name, e-mail address
Consultix GmbH (Germany)	To assist in the creation of PayPal Business Accounts for merchants on-boarding through their bank's payment gateway	All information provided by the merchant (directly or via his bank) for the purpose of creating his PayPal business account (including without limitation email address, address, business name, business contact details and bank account details)
Group companies		
PayPal Inc. (USA)	Acting on behalf of PayPal for the purposes of storing and processing of account information	All account information
PayPal Europe Services Limited (Ireland) and eBay Europe Services Limited (Ireland)	Acting on behalf of PayPal for the purpose of customer support, risk assessment, compliance and other back office	All account information
PayPal Private Limited (Singapore)	Acting on behalf of PayPal to enter into and perform non-customer contracts which involve customer data	All account information
eBay Inc. (USA), eBay Europe S.á r.l. (Luxembourg), eBay International AG (Switzerland), eBay CS Vancouver Inc. (Canada), eBay Partner Network, Inc. (USA), , Skype Communications SA (Luxembourg), Skype Software SA (Luxembourg), Skype Inc. (USA), GumTree.com Limited (UK), Kijiji International Limited (Ireland), Kijiji US, Inc. (USA), mobile.de & eBay Motors GmbH (Germany), Shopping.com Inc. (USA), Shopping Epinions International Limited (Ireland), PayPal Australia Pty Limited, Marktplaats B.V (Netherlands), Tradera AB (Sweden), StubHub, Inc. (USA), Viva Group, Inc. (USA), ProStores Inc. (USA), MicroPlace, Inc. (USA), Internet Auction Co., Ltd. (Korea), Via-Online GmbH (Germany), Bill Me Later, Inc. (US)	To provide joint content and services (like registration, transactions and customer support), to assess risk, to help detect and prevent potentially illegal acts and violations of policies, and to guide decisions about their products, services and communications (not acting as a sub-contractor of PayPal)	All account information
Agencies		
CSSF (Luxembourg) Financial Ombudsman Service (United Kingdom), Altroconsumo (Italy), European Consumer Centre Network organisations located in Austria, Belgium, Bulgaria Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, The Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom and the, Les Mediateurs du Net (France), BaFin (Germany)	To provide them with information within their authority (upon their request) and to respond to queries and/or investigations instigated by users or other stakeholders in the countries they have jurisdiction.	All account information

- d. For the purpose of this table, the phrase "All account information" includes: name, address, e-mail, telephone number, IP address, account number, account type, details of funding instruments associated with the account, details of payment transactions, details of commercial transactions, customer statements and reports, account preferences, details of identity collected as part of our "know your customer" checks on you, and customer correspondence.
- e. With respect to the column titled, "Purpose", each third party, with the exception of the regulatory agencies and group companies referred to at the end of this table, is carrying out the purpose to fulfil obligations which PayPal has contracted with the entity to fulfil. The regulatory agencies are carrying out their purpose in accordance with their regulatory objectives and requirements.
- f. Disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
- g. Disclose aggregated statistical data with our business partners or for public relations. For example, we may disclose that a specific percentage of our users live in Manchester. However, this aggregated information is not tied to personal information.
- h. As with any other business, it is possible that PayPal in the future could merge with or be acquired by another company. If such an acquisition occurs, the successor company would have access to the information maintained by PayPal, including customer account information, but would continue to be bound by this Privacy Policy unless and until it is amended.

Our Contacts with PayPal Customers

We communicate with users on a regular basis via email to provide requested services, and we also communicate by phone to resolve customer complaints or claims made by users via PayPal, respond to requests for customer service, inform you if we believe your account or any of your transactions have been used for an illegitimate purpose, confirm information concerning your identity, business or account activity, carry out collection activities, conduct customer surveys or investigate suspicious transactions. We use your email or physical address to confirm your opening of a PayPal account, to send you notice of payments that you send or receive through PayPal (including referral payments described below), to send information about important changes to our products and services, and to send notices and other disclosures required by law. Generally, users cannot opt out of these communications, but they will be primarily informational in nature rather than promotional.

We also use your email address to send you other types of communications that you can control, including the PayPal Periodical newsletter, auction tips, customer surveys and notice of special third-party promotions. You can choose whether to receive some, all or none of these communications when you complete the registration process, or at any time thereafter, by logging in to your account on the PayPal website and changing your preferences in the Profile page of the My Account tab.

In connection with independent audits of our financial statements and operations, the auditors may seek to contact a sample of our customers to confirm that our records are accurate. However, these auditors cannot use personally identifiable information for any secondary purposes.

Your Use of Information and Our Services

In order to facilitate the transactions between PayPal members, our service allows you limited access other users' contact or delivery information. As a seller you may have access to the User ID, email address and other contact or delivery information of the purchaser, and as a purchaser you may have access to the User ID, email address and other contact information of the seller.

By entering into our User Agreement, you agree that, with respect to other users' personally identifiable information that you obtain through the site or through a PayPal-related communication or PayPal-facilitated transaction, you will only use this information for: (a) PayPal-related communications that are not unsolicited commercial messages, (b) using services offered through PayPal (e.g. insurance, delivery and fraud complaints), and (c) any other purpose that such user consents to after adequate disclosure of the purpose(s).

In all cases, you must provide users with the opportunity to remove themselves from your database and review any information you have collected about them. More generally, you must comply with all applicable privacy regulations, in particular as they relate to the sending of marketing emails.

PayPal does not tolerate spam. We strictly enforce our Anti-Spam Policy. To report PayPal-related spam to PayPal, please [contact us](#).

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5. Information Security

PayPal is committed to handling your customer information with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

For more information on PayPal's security practices, please visit the [PayPal Security Centre](#).

The security of your PayPal account also relies on your protection of your PayPal password. You may not share your PayPal password with anyone. PayPal representatives will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorised and suspicious and forwarded to spoofof@paypal.com. If you do share your PayPal password with a third party for any reason, including because the third party has promised to provide you additional services such as account aggregation, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also contact us right away as described below.

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6. Accessing and Changing Your Information

You can review the personal information you provided us and make any desired changes to such information, or to the settings for your PayPal account, at any time by logging in to your account on the PayPal website and changing your preferences in the Profile page of the "My Account" tab. You can also close your account through the PayPal website. If you close your PayPal account, we will mark your account in our database as "Closed," but will keep your account information in our database. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new

account. However, if you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, or as required by law.

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7. Accountability

Our privacy office is responsible for ensuring that our day-to-day procedures comply with this Privacy Policy. If you want to exercise your right to access your information or have any questions about this privacy statement, PayPal's information practices, or your dealings with PayPal, you can contact us by using [this form](#), or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.l. & Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg.

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8. IMPORTANT DATA PROTECTION FOR CUSTOMERS OF PAYPAL PRO

A GUIDE TO THE USE OF YOUR PERSONAL DATA BY PAYPAL EUROPE SARL & CIE, SCA AND CREDIT REFERENCE AGENCIES

SECTION 1: GENERAL INFORMATION ON OUR USE OF CREDIT REFERENCE AGENCIES

Q: What is a credit reference agency?

A: Credit reference agencies (CRAs) collect and maintain information on consumers' and businesses' credit behaviour, on behalf of financial institutions and lenders in the UK.

Q: Why do you use them when I have applied to your organisation?

A: Although you have applied to us, PayPal (Europe) S. à.r.l. & Cie, S.C.A. and we will check our own records, we will also contact CRAs to get information on your credit behaviour with other organisations. This will help us make the best possible assessment of your overall situation before we make a decision.

Q: Where do they get the information?

A: * Publicly available information:

- The Electoral Register at Local Authorities
- County Court Judgments from Registry Trust.
- Bankruptcy information from the Insolvency Service
- * Fraud information from fraud prevention agencies

* Credit information comes from information on applications to banks, building societies, credit card companies etc and also from the conduct of those accounts

Q: How will I know if my information is to be sent to a CRA or Fraud prevention agency?

A: Organisations are only allowed to send information to CRAs and/or Fraud Prevention Agencies with your agreement and knowledge. You will be told when you apply for Website Payments Pro if your data will be supplied. The next section of this document will tell you how, when and why we will search at CRAs and what we will do with the information we obtain from them. We will also tell you if we plan to send information on you or your business, if you have one, to CRAs.

Q: Why is my data used in this way?

A: We and other organisations want to make the best possible decisions we can, in order to make sure that you, or your business, will be able to carry out your obligations to us. We and other organisations may also use the information to check your identity. In this way we can ensure that we all make responsible decisions. At the same time we also want to make decisions quickly and easily and, by using up to date information, provided electronically, we are able to make the most reliable and fair decisions possible.

Q: Who controls what credit reference agencies are allowed to do with my data?

A: All organisations that collect and process personal data are regulated by the Data Protection Act 1998, overseen by the Office of the Information Commissioner. All credit reference agencies are in regular dialogue with the Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000.

Q: Can just anyone look at my data held at credit reference agencies?

A: No, access to your information is very strictly controlled and only those that are entitled to do so, may see it. Usually that will only be with your agreement or (very occasionally) if there is a legal requirement.

SECTION 2 WHAT PAYPAL (EUROPE) S.A.R.L. & CIE, S.C.A DOES

Please read this section very carefully.

a. When you apply to us for Website Payments Pro we may:

- i. Check our own records for information on your PayPal account(s)
- ii. Search at credit reference agencies for information on:
 1. Public data on your credit behaviour
 2. Information on the conduct of your personal credit accounts if you are proprietors of a small business;
 3. your business accounts;

iii. Search at fraud prevention agencies for information on you

b. What we do with the information you supply to us as part of the application:

- i. Information that is supplied to us will be sent to the credit reference agencies.
- ii. If you give us false or inaccurate information and we suspect fraud, we will record this and may also pass this information to financial and other organisations involved in fraud prevention to protect us, them and our respective customers from theft and fraud.
- iii. Your data may also be used by this organisation, to offer your business other products.

c. With the information that we obtain we will:

- i. Assess this application for Website Payments Pro and/or;
- ii. Verify your identity and the identity of other directors/partners and/or;
- iii. Undertake checks for the prevention and detection of fraud and/or money laundering.
- iv. We may use scoring methods to assess this application and to verify your identity.
- v. Manage your PayPal account(s) with ourselves.
- vi. Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services.
- vii. Any or all of these processes may be automated.

d. What we do when you have set up Website Payments Pro:

- i. Where you have access to and use Website Payments Pro with us, we will give details of your PayPal account and other details of your use of Website Payments Pro, including names and parties to the account, and how you manage it to credit reference agencies.
- ii. If you owe us money and do not pay in full and on time, we will tell credit reference agencies.
- iii. We may make periodic searches of our own group records, credit reference and fraud prevention agencies to manage your account with us, to take decisions regarding your identity and also credit, including whether to make Website Payments Pro available or to continue or extend existing services to you.
- iv. If you owe us money and do not make payments that you owe us, we will trace your whereabouts and recover payment.

What Credit Reference agencies do

e. When credit reference agencies receive a search from us they will:

- i. Place a search "footprint" on your company credit file whether or not this application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future.
- ii. Link together the previous and subsequent names advised by you, of anyone that is a party to the account.

f. Supply to us:

- i. Information about your company or credit information such as previous applications for credit and the conduct of the accounts
- ii. Public information such as County Court Judgments (CCJs) and bankruptcies.
- iii. Electoral Register information on you and your business partners.
- iv. Fraud prevention information.

g. When information is supplied by us, to them, on your account(s):

- i. Credit reference agencies will record the details that are supplied on your account including previous and subsequent names of the parties
- ii. If you owe us money and do not pay in full and on time, credit reference agencies will record the outstanding debt.
- iii. Records shared with credit reference agencies remain on file for six years after they are closed whether settled by you or defaulted.

h. How your data will NOT be used by credit reference agencies:

- i. It will not be used to create a blacklist.
- ii. It will not be used by the credit reference agency to make a decision.

i. How your data WILL be used by credit reference agencies:

- i. The information which we, other organisations and fraud prevention agencies provide to the credit reference agencies about you, your financial and/or business associates and your business may be supplied by credit reference agencies to other organisations and used by them to: -
 1. Verify your identity if you or your financial or business associate applies for other facilities including all types of insurance applications and claims.

2. Assist other organisations to make decisions on credit, credit related services and on motor, household, life and other insurance proposals and insurance claims, about you, your partner, other members of your household or your business.
 3. Trace your whereabouts and recover payment if you do not make payments that you owe.
 4. Conduct checks for the prevention and detection of crime including fraud and/or money laundering.
 5. Manage your personal, your partner's and/or business account
 6. Manage your personal, your partner's and/or business insurance policies (if you have one/any).
 7. Undertake statistical analysis and system testing.
- ii. Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.
- iii. Your data may also be used to offer you other products, but only if you have not opted out of receiving such offers.

How to find out more

You can contact credit reference agencies currently operating in the UK (the main ones are listed below). The information they hold may not be the same so it is worth contacting them all. They will charge a small statutory fee.

CallCredit Ltd, Consumer Services Team, PO Box 491 Leeds, LS3 1WZ or call GB +44 8700601414 Call or log on to www.callcredit.co.uk

Experian, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call GB +44 8702416212 Call or log on to www.experian.co.uk

Equifax Plc, Customer Advice Centre, PO Box 3001, Bradford, BD1 5US or call GB +44 8700100583 Call or log on to www.equifax.co.uk

Dun & Bradstreet, Customer Service Department, Westminster House, Portland Street, Manchester M1 3HU or call GB +44 8702432344 Call or log on to <http://www.dnb.co.uk/>

If you want to receive details of those fraud prevention agencies from whom we obtain and with whom we record information about you, contact/write to us at PayPal (Europe) S.à r.l. & Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg. You have a legal right to these details.

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