

An Post Money Current Account, Currency Card, Credit Card and Loan Privacy Statement

Introduction

An Post (“we” or “us”) will collect and process your Personal Data, and other information in relation to your dealings with us, in connection with An Post Money. This privacy statement explains how we will manage your Personal Data connected with An Post Money, why we use it, and how you may contact us.

An Post Money is the term An Post uses to cover financial services offered by An Post. These services include current account services, currency cards, credit cards and loans.

Where we need to process your Personal Data in connection with An Post Money, or where we have a legal obligation to collect certain Personal Data relating to you (for example, in order to comply with our AML obligations), we will not be able to provide you with the product or service which you have requested if you do not provide this information to us.

We trust that you appreciate we respect your right to privacy and that our honesty and integrity shall mean that you will continue to trust us with your Personal Data, knowing that we will not use it for any inappropriate purpose.

When applying for an An Post credit card or loan

When you fill out an application form in order to apply for an An Post Money credit card or loan you are redirected to Avant Money. Avant Money are the underwriters and data controller for the personal data provided by you in connection with your application and will process the personal data in accordance with their privacy policy. Please see Avant Money Privacy Policy at <https://www.avantmoney.ie/privacy-notice>

Moneyback Scheme

As a customer of an An Post current account or credit card you qualify to be part of our Moneyback Scheme. Please see the An Post Money webpage in order to get information on this Moneyback Scheme. In order to successfully administer the Moneyback Scheme An Post must process your personal data and your transactional data. This is to ensure that you get money back for using your current account debit card or your credit card in the Moneyback retail outlets.

Types of information we collect

Personal Data means any information which the An Post Group has or obtains or which you provide, such as your name, address, e- mail address, telephone number(s) and date of birth, from which you can be directly or indirectly personally identified, and includes information such as identification, tax references, account numbers, IP addresses and online identifiers. Some of this Personal Data may be “Special Category” Personal Data, such as data revealing your racial or ethnic origin, political opinions, or trade union membership, data concerning health or data concerning a natural person’s sex life or sexual orientation.

We may also collect certain statistical and other analytical information collected on an aggregate basis relating to all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding browser types, mobile device equipment, mobile network and other anonymous statistical data involving the use of our website. We collect this information to help us monitor traffic and enhance your experience of our website.

How we obtain your Information

We will obtain some of your Personal Data directly from you, such as when you complete an application form for any of the An Post Money services, either online or at the Post Office, when you transact with any of your An Post Money accounts, including through our website or the An Post Money Current Account App, and where you enter your details into our online forms (e.g. 'Download an An Post Money Current Account Info Pack', 'Apply for an An Post Money Current Account today', 'Apply for a currency card today', or 'Request a Call Back')

We may also obtain some of your information indirectly, from a variety of sources, such as your joint account holder(s), and / or our service providers, such as vendors providing anti-money laundering and sanctions checking databases. We may also obtain some of your information from our currency card providers.

Why we hold and how we use your Information

We will use your Personal Data, but only to the extent necessary:

1. for the purposes of performing the contract you have entered into with us where you have opened an An Post Money Current Account or applied for a currency card namely:
 - a) for the purposes of providing services to you, and setting up and administering your An Post Money Current Account or currency card facility;
 - b) to facilitate you in accessing your An Post Money Current Account or your currency card online in a secure manner where we have agreed to give you access to the An Post Money online service;
 - c) to contact you if required in connection with, or to deal with queries, complaints or suggestions in relation to, your An Post Money Current Account or your currency card or transactions on or relating to your An Post Money Current Account or your currency card;
2. where you have consented to our use for a particular purpose, such as for marketing (see Marketing Preferences below). If you do give your consent for us to use your Personal Data for a particular purpose, you have the right at any time to withdraw your consent to our future use of your Personal Data for some or all of those purposes by writing to us at the address set out under "Contact Us" below.
3. for compliance with our legal obligations, including:
 - a. anti-money laundering and anti-terrorist financing (collectively "AML") and fraud prevention purposes. This may include the collection and processing of Special Category Personal Data in connection with our obligations under applicable AML laws. Any Special Category Personal Data will only be used and disclosed, as necessary, for such purposes;
 - b. compliance with applicable tax and regulatory reporting obligations;
 - c. where we are ordered to disclose information by a court with appropriate jurisdiction;
 - d. recording of telephone calls and electronic communications in order to comply with applicable law and regulatory obligations;
4. where our use is for a legitimate purpose of the An Post Group, including:
 - a) for day to day operational and business purposes, including board and group reporting and management purposes;
 - b) taking advice from our external legal and other advisors;
 - c) to help us improve our services and systems, and to improve your experience on our web and online services;
 - d) to undertake market research, statistical and product development analyses;

- e) to provide you with information in relation to the An Post Money and certain selected third parties, where we are permitted to do so (please see “Marketing Preferences” below for further information); and
 - f) in deciding what marketing information to send to you and to make it more relevant to you (please see “Making Marketing Relevant to You” below for further information);
 - g) the reorganisation or sale of the whole or part of our or An Post Group business;
5. where necessary to establish, exercise or defend our or An Post Group legal rights or for the purpose of legal proceedings; and
 6. for such other purposes as were notified to you at the time you provide the information to us.

When we disclose your Information

We will not disclose any of your Personal Data to any third party, except as outlined above and / or as follows:

1. where the disclosure is necessary to enable us to carry out our obligations under our agreement with you;
2. to verify the authenticity of documentation provided to us (for example, we may use external databases and other address verification tools to verify a customer’s identity)
3. where we need to provide the Personal Data to counterparties to transactions entered into by you;
4. in the case of a joint account, to the other account holder(s);
5. to anyone providing a service to us or acting as our agents, which may include either companies within the An Post Group or third party service providers, on the understanding that they will keep the Personal Data confidential;
6. where we need to share your Personal Data within the An Post Group or with our auditors, and our legal and other advisors;
7. to any (or any proposed) assignee, transferee, or successor in title to the whole or any relevant part of our business, and their respective officers, employees, agents and advisers; and
8. if the disclosure is required by law or regulation, or court or administrative order having force of law, or is required to be made to any of our regulators.

Recipients of your Personal Data

In any case where we share your Personal Data with a third party data controller (including, as appropriate, counterparties to transactions on any of your), the use by that third party of the Personal Data will be subject to the third party’s own privacy policies.

When you visit our website, you are accepting the An Post website terms of use, as well as the terms of this Privacy Statement. We are not responsible for the content or privacy practices of other websites that may link to or be linked to from the An Post website. When travelling to a third party website the URL in the toolbar at the top of the webpage will change.

International transfers

Personal Data may be transferred outside the European Economic Area (the “EEA”) in connection with transactions on your An Post Money Current Account or currency card in accordance with your instructions, where you have explicitly consented, and / or as otherwise required or permitted by law.

Many of the countries will be within the EEA, or will be ones which the European Commission has approved, and will have data protection laws which are the same as or broadly equivalent to those in

Ireland. However, some transfers may be to countries which do not have equivalent protections, and in that case, we will use reasonable efforts to implement contractual protections for the Personal Data. While this will not always be possible where we are required to transfer the Information in order to comply with and perform our contract with you or where we have a legal obligation to transfer the Personal Data, any transfers will be done in accordance with applicable data protection laws, including through the implementation of appropriate or suitable safeguards in accordance with such applicable data protection laws.

An Post Money Current Account Online and An Post Money Current Account App

When you open an An Post Money Current Account, you will be provided with a 10 digit number (your "User ID") which will enable you to register for An Post Money Current Account online services. The information which you provide as part of your log in to An Post Money Current Account online services (e.g. your User ID and your 5 digit self-select PIN) is not retained by us when access is gained to An Post Money Current Account online services.

To start using the An Post Money Current Account App you must have provided your e-mail address, your mobile phone number and your mother's maiden name when applying for an An Post Money Current Account. You must also be registered for An Post Money Current Account online services.

During activation of the An Post Money Current Account online services and the An Post Money Current Account app, we will use your Personal Data to transmit an authentication code to the mobile number you provided in your application to open an An Post Money Current Account. Any information that is gathered in respect of transactions on your An Post Money Current Account is retained by us for the sole purpose of operating your account.

An Post currency card customers may also download an App with a view to managing their currency card account online.

Use of Cookies

A cookie is a small piece of information which is transferred to your computer's hard disk from a website. Cookies can store information about your preferences and other information which you need when you visit the website.

We use cookies to help us to improve the An Post Money online services and our website and to deliver a better and more personalised service to you. Please read our cookies policy for further information on our use of cookies.

Telephone calls

Please note that we may monitor and record telephone calls made to and from us for fraud and crime prevention, to assist in improving customer services, to evidence instructions or to prevent or resolve disputes. We will also monitor and record calls if we are obliged to do so by any service regulator.

Retention of your Personal Data

We are obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal, regulatory, fraud prevention and legitimate business purposes.

We are obliged by law to retain AML related identification and transaction records for six years from the end of the relevant investor relationship or the date of the transaction respectively.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by us or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, we (or our service providers on our behalf) will hold this information for a period of seven years, unless we are obliged to hold it for a longer period under law or applicable regulations. This includes information relating to queries which are specific to any of your An Post Money accounts.

If Personal Data is disclosed to us by you in connection with a general enquiry into the An Post Money website, for example where you enter your details into a website form or you send us an e-mail, that Personal Data will be retained for a period of 13 months.

We will also retain records of telephone calls and any electronic communications for a period of five years and, where requested by the Central Bank, for a period of up to seven years.

Your rights in relation to your Personal Data Updating and correcting your Personal Data

If we hold incorrect Personal Data about you, you have the right to have the data amended. While we will use reasonable efforts to keep your Personal Data up to date, you will need to notify us without delay in the event of any change in your personal circumstances, so that we can keep the Personal Data up to date.

You can update your Personal Data by writing to An Post Money, BillPost, Enterprise House, Cappa Road, Kilrush, Co. Clare, V15 VX23 together with:

- Your name and address.
- A description of the specific Personal Data you wish rectified.

If you have an An Post Money Current Account, you can also update your Personal Data by logging into your account at [an post.com/currentaccount](https://anpost.com/currentaccount)

Right of erasure

You have the right in some circumstances to have your Personal Data, which we hold, erased. If you request an erasure of your Personal Data, all your data will be erased subject to the following important notice.

We will not be required to erase your data where to do so would prevent us from meeting our respective contractual obligations, or where we are required to process (including retaining) your Personal Data in order to comply with a legal obligation, or if the Personal Data is necessary to establish, exercise or defend our or An Post Group legal rights or for the purpose of legal proceedings.

Right of Access

You have a right to be given a copy of your Personal Data on request, subject to certain exceptions. To request a copy of your Personal Data, please contact the Data Privacy Office, An Post, Room 2-172, GPO, O'Connell Street, Dublin 1, D01 F5P2.

Please note that we have the right to require that you identify yourself before we will respond to any access request.

Your Other Rights

You also have the right, in certain circumstances, to request restriction on the use, of your Personal Data, and to object to certain uses of your Personal Data, in each case subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with our processing of your Personal Data can be obtained by writing to us at the address set out under "Contact Us" below.

In any case where we rely on your consent to process your Personal Data, you have the right to change your mind and withdraw consent by writing to us at the address set out under "Contact Us" below. Where we rely on legitimate purpose of ours or of a member of the An Post Group or a third party recipient of the Personal Data, in order to use and disclose Personal Data, you are entitled to object to such use or disclosure of your Personal Data, and if you do so, we will cease to use and process your Personal Data for that purpose, unless we can show there are compelling legitimate reasons for us to continue or we need to use the Personal Data for the purposes of legal claims.

In limited circumstances, you may also have the right to data portability in respect of certain of your Personal Data, which means you can request that we provide it to you in a structured, commonly used and machine-readable format, or transmit it to your third party nominee where this is technically feasible.

You have the right to lodge a complaint about our processing of your Personal Data with the Data Protection Commissioner at info@dataprotection.ie.

Marketing preferences

Where you request An Post Money Account Information Online Forms:

Where you choose to give us Personal Data, such as where you enter your details into our website forms (e.g. 'Download an An Post Money Current Account Info Pack', 'Apply for an An Post Money Current Account today', 'Apply for a currency card today', or 'Request a Call Back'), we will use this information to send you an acknowledgement e-mail and to provide you with the information you have requested.

We may also send you subsequent emails, SMS messages or contact you by phone to follow up on your initial query. Initial telephone calls will be made within 48 hours where you request a call back, during the hours of 9.00am to 5.00pm, Monday to Friday.

Where you have agreed, we may also contact you in relation to other marketing (see Other Marketing by An Post).

Post Office Referrals:

Where you provide Personal Data at the counter in a Post Office in order to receive information about any An Post Money services, we will use these details to send you an acknowledgement e-mail. We may also send you subsequent e-mails, SMS messages or contact you by phone in relation to the initial data collection. Where you have agreed, we may also contact you in relation to other marketing (see Other Marketing by An Post). **Where you are an An Post Money Current Account Customer**

If you are an An Post Money Current Account customer but you have not yet activated your card or lodged money to your account, you may be contacted by email, SMS message or phone with regard to activating your card and lodging money to your account.

An Post Money Current Account customers and currency card customers will also be contacted with non-marketing service information in relation to the An Post Money Current Account and currency card

account .

Where you have agreed, we may also contact you in relation to other marketing (see Other Marketing by An Post).

Other Marketing by An Post

Where you have agreed to receive marketing from An Post, we will use this information to contact you with news and special offers from the An Post Group of companies and select third parties, including information in relation to An Post Money Current Account and the An Post Money Current Account MoneyBack programme.

An Post may provide you with information on behalf of the An Post Group of Companies or companies who are part of the An Post Money Current Account MoneyBack programme.

An Post Group of Companies:

Data Ireland, GeoDirectory, Post Insurance, PCI, PostPoint, PrintPost, Prize Bonds, BillPost, Air Business.

MoneyBack programme companies:

Lidl Ireland, SSE Airtricity, Intersport Elverys, Post Insurance, Kennys.ie, OutdoorLiving.ie, Oxendales, Sunway,

If you have not agreed to receive marketing from An Post, we will not be able to send you information in relation to the companies who are part of the An Post Money Current Account and credit card MoneyBack programme, even if you are an An Post Money Current Account and credit card customer.

Making Marketing Relevant to You

Where you have agreed beforehand we may use and analyse your Personal Data, including transaction data, in order to make the marketing materials we send to you more relevant to your interests and requirements. We may also use your Personal Data as part of more general market, statistical and product development analyses in relation to our business generally.

You can object to us analysing your Personal Data in this way by writing to us at the address set out under "Contact Us" below. [If you do object to this analysis, the marketing information you receive will not be made more relevant to you.]

No Disclosure for Marketing Purposes

Your Personal Data will not be given to any third parties for marketing purposes. Where you have opted to receive marketing information, you will always be contacted by An Post. An Post may, however, provide you with information on behalf of the An Post Group of companies or companies who are part of the An Post Money Current Account MoneyBack programme.

Opting out of Marketing

You can change your marketing preferences at any time by calling 01 705 8000 or, if you are an An Post Money Current Account customer, by going to 'My details' tab in An Post Money Current Account online.

Each time we send you marketing information, we will give you the option to change your mind about receipt of marketing (e.g. SMS: text STOP).

If you change your mind about receiving marketing from An Post, we will not be able to send you information in relation to the companies who are part of the An Post Money Current Account MoneyBack programme, even if you are an An Post Money Current Account customer.

Use of Non-Personal Data from our Website

We use the Non-Personal Data gathered from visitors to our website in an aggregate form to understand the demographics of the users of our website, to help us better design and organise our websites and mobile applications. We use these analytics tools to assist in gathering and analysing Non-Personal Data for the reasons described above.

Our analytics solutions may also collect your IP address as part of this analysis. No other form of Personal Data is gathered by these analytics services.

Except as explained above in relation to your IP address, by simply visiting our website, you do not disclose, nor do we collect, Personal Data on you. The information collected about your visit may be limited to technical data which is used for administrative and statistical purposes. We will use this information to help us to improve our website.

We may provide Non-Personal Data to third parties, where such information is combined with similar information of other users of anpost.com/currentaccount and the An Post Money Current Account App. For example, we may inform third parties regarding the number of unique visitors to smartaccount.ie website, or the use of the An Post Money Current Account App, the demographic breakdown of users of our website and mobile app, or the activities that visitors to smartaccount.ie engage in while online. The third parties to whom we may provide this information may include our website design, development, digital, support and hosting contractors.

Contacting Us

Any queries or complaints regarding our use of the Personal Data and / or the exercise of your individual rights should be addressed to the Data Privacy Office, An Post, GPO, O'Connell Street, Dublin 1, D01 F5P2.

Contact Details

Phone: 00 353 (1) 705 8000

E-mail: Customersupport@anpostmoney.com

By Post:

An Post Money BillPost Enterprise House Cappa Road Kilrush
Co. Clare V15 VX23

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