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1 Introduction

Welcome to the Coop Services Ltd., privacy notice.

Coop Services Ltd., respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about what to expect when we collect and process personal information. It will also tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

10. GLOSSARY

1 Important information and who we are

1.1 Purpose of this privacy notice

This privacy notice aims to give you information on how Coop Services Ltd., collects and processes your personal data, including any data you may provide through this website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1.2 Controller

Coop Services Ltd., is the controller and responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

1.3 Contact details

Our full details are:

Coop Services Ltd., - Old Church Square – B’kara BKR 1705 Malta

You have the right to make a complaint at any time to the Office of the Information and Data Protection Commissioner (the “Commissioner”), the Maltese supervisory authority for data protection issues (www.idpc.org.mt). We would, however, appreciate the chance to deal with your concerns before you approach the Commissioner, so please contact us in the first instance.

1.4 Effective Date of the privacy notice and your duty to inform us of changes

This version was created on 25 May 2018. Any historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1.5 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, country of residence and nationality and references.
- **Documentary Data** includes copies of your passport, driver's licence, ID card and proof of address.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details, income information, source of wealth and financial position, status and history.
- **Contractual Data** includes details about the products or services we provide to you.
- **Transaction Data** includes details about payments to and from your accounts with us and other details of products and services you have purchased from or through us.
- **Open Data** includes details about you that are in public records, such as Court Registry], and information about you that is openly available on the internet.
- **Social Relationships Data** includes your family and other relationships.
- **Location Data** includes data we get about where you are, such as may come from a shop where you buy something with your card.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Communications Data** includes what we learn from you from letters, emails and conversations between us.
- **Profile Data** includes your username and password, purchases made by you, your interests, preferences and feedback.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Category Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data, and information about criminal convictions and offences. We will only collect and use these types of data if the law requires or allows us to do so.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

2.1 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We may collect personal information about you (or your business) from these sources:

Data you give us:

When you apply for our products and services;

When you talk to us on the phone;

- When you use our website, or online portal;
- In letters, emails and other forms of electronic communication;
- In other documents;
- If your business is looking to enter into, or has entered into, a business arrangement with us.

Data we collect when you use our services. This includes the amount, frequency, type, location, origin and recipients of:

- Payment and transaction data;
- Profile usage and technical data. This includes the profile you create to identify yourself when you connect to our internet, mobile and telephone services. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Data from third parties we work with or otherwise publically available:

- Companies within the Coop Services Ltd.,
- Companies that introduce you to us;
- Card associations;
- Fraud prevention and law enforcement agencies;
- Insurers;
- Retailers;
- Social networks;
- Public information sources;
- Agents working on our behalf;
- Credit Reference Agencies and other Reference Database;

3 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications about our [and third parties] products and services to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

3.1 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you (or your business) as a new customer or supplier	(a) Identity (b) Contact (c) Documentary (d) Financial (e) Open (f) Special Category	(a) Performance of a contract with you (b) To comply with a legal obligation
To deliver our products or services including: (a) Administer and manage your account, including to process transactions you make on your account (b) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Contractual (e) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(c) Collect and recover money owed to us	(b) Contact (f) Open	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms and conditions or Privacy Notice (b) Studying how our customers use products and services from us and other organisations (c) Develop and carrying out marketing activities	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Transaction (f) Location (g) Usage	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services, to further develop our products and services, and to be efficient about how we fulfil our legal duties)
To develop and manage our brands, products and services To manage how we work with other companies that provide services to us and our customers	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Transaction (f) Location (g) Usage	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to develop our products and services, to define types of customers for new products and services, to further our business and the business of Group of Companies and to be efficient about how we fulfil our legal duties)
To detect, investigate, report and seek to prevent financial crime To manage risk for us and our customers To obey laws and regulations that apply to us To respond to complaints and seek to resolve them	(a) Identity (b) Contact (c) Documentary (d) Transaction (e) Location (f) Profile (g) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to develop and improve how we deal with financial crime, and to be efficient about how we fulfil our legal duties)

	(h) Social Relationships (i) Financial	
To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, technical, corporate governance and audit.	(a) Technical (b) Contractual (c) Financial (d) Transaction	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, and network security) (b) Necessary to comply with a legal obligation
To exercise our rights set out in agreements or contracts	(a) Identity (b) Contact (c) Financial (d) Contractual (e) Transaction (f) Communication	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to exercise our legal rights)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our products/services and grow our business)

you	(c) Technical (d) Usage (e) Profile (f) Marketing and Communications	
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3.2 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

3.3 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us (or from another company within the Coop Services Ltd., Group of Companies) if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

You will also receive communications from us about third party products if you have provided your express consent for receiving that marketing.

3.4 Third-party marketing

We will not share your personal data with any company outside the Coop Services Ltd., and the company's sub contractors.

3.5 Opting out

You can ask us to stop sending you marketing messages by contacting us at any time. Where you opt out of receiving these marketing messages you will still receive statements, and other important information such as changes to your existing products and services.

3.6 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

3.7 Telephone Calls

We may monitor and/or record your telephone calls to us, or ours to you, to ensure consistent servicing levels (including staff training) and account operation, to receive any instructions from you, to assist (where appropriate) in dealing with complaints or disputes, and to assist us in ensuring we comply with our legal obligations.

3.8 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#) on [+35621480707].

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3.9 Credit Reference Agencies (CRAs)

This section explains how we work with outside companies to decide whether to provide you with credit through our products. It explains what we do and why we do it.

We carry out credit and identity checks when you apply for a product or services for you or your business. We may use Credit Reference Agencies to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

Name, address and date of birth

Details of credit

Financial situation and history

Public information.

We'll use this data to:

Assess whether you or your business is able to afford to make repayments

Make sure what you've told us is true and correct

Manage your accounts with us

Trace and recover debts

We will go on sharing your personal information with CRAs for as long as you are a customer. This will also include details of any repayments and outstanding balance. The CRAs may give this information to other organisations that want to check your credit status.

4 Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Companies within the Coop Services Ltd., Group of Companies.
- External Third Parties & Sub-Contractors
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5 International transfers

We share your personal data within the Group of Coop Services Ltd., Companies. This may involve transferring your data outside the European Economic Area (EEA).

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [*European Commission: Adequacy of the protection of personal data in non-EU countries.*](#)
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [*European Commission: Model contracts for the transfer of personal data to third countries.*](#)
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [*European Commission: EU-US Privacy Shield.*](#)

6 Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7 Data retention

7.1 How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention and disposal policy which you can request from us by [contacting us](#).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [contact us](mailto:info@maltacoop.com) on info@maltacoop.com

8.1 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

8.2 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

8.3 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9 Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#)

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

The Coop Service Ltd.,

External Third Parties

- Agents, members, sub-contractors and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business.
- Regulators and other authorities.
- Fraud prevention and law enforcement agencies.
- Any party linked with your or your business's product or service.
- Companies we have a joint venture or agreement to co-operate with.
- Organisations that introduce you to us.
- Companies that we introduce to you.
- Companies you ask us to share your data with.

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

We may also share your personal information if the make-up of The Coop Services Ltd., changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private.
- If the change to our Group happens, then other parties may use your data in the same way as set out in this notice.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

This Privacy Notice apply to any products or services we provide to you. In the event of any inconsistency between anything contained in these Privacy Notices and the relevant terms and conditions, the Privacy Notice shall prevail.