Mastercard

Binding Corporate Rules

External Version

Mastercard Binding Corporate Rules
External Version

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Mastercard EEA Binding Corporate Rules

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External Version

Mastercard EEA Binding Corporate Rules
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I. Summary

Mastercard is a technology company in the global payments industry that connects Individuals, financial institutions, merchants, governments, public sector bodies, and businesses worldwide. We facilitate the processing of payment transactions permitting Mastercard cardholders to use their cards and other payment technologies at millions of merchants and allowing Individuals, financial institutions, businesses, public sector bodies and businesses to complete payments among themselves. Our network provides Individuals and businesses with a quick, convenient and secure payment method that is accepted worldwide. Our mission is to make payments safe, simple and smart.

To support that mission Mastercard has established a comprehensive privacy and data protection program. We dedicate significant global resources to ensure compliance with applicable data protection laws and we have embedded privacy and data protection into the design of our products and services.

We take privacy and data protection seriously at Mastercard. We have a dedicated Privacy & Data Protection Team that is led by our Chief Privacy Officer who reports to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee who reports to Mastercard's Chief Executive Officer.

Mastercard conducts the following types of data Processing activities:

- **Payment processing.** As a processor of payment transactions, Mastercard obtains and processes Personal Information about cardholders and other Individuals from customers (e.g., issuing financial institutions (issuers), acquiring financial institutions (acquirers), merchants, public sector bodies, partners (e.g., digital wallets) and other businesses) to facilitate payment transactions;

- **Fraud prevention and detection.** Mastercard collects and processes Personal Information of Individuals to prevent, identify, detect, and protect against any type of fraud;

- **Direct-to-consumer services.** Mastercard collects and processes Personal Information of Individuals (e.g., name, email, telephone number, type of payment card) to provide services and programs directly to them or benefitting them, such as loyalty and rewards programs, digital wallets, cardholder services, marketing programs and promotions;

- **Open banking services.** Mastercard provides connectivity services (as a technical service provider between and on behalf of Account Servicing Payment Service Providers ("ASPSPs") and Third Party Providers ("TPPs")), Account Information Services and Payment Initiation Services as a TPP, as well as financial analysis services.

- **Customer management.** Mastercard collects and processes Personal Information of staff of customers, merchants, suppliers and vendors (e.g., business contact information) to contact them, to manage business relationships and to offer support services; and

- **Employee management.** Mastercard collects and processes Personal Information of Employees (e.g., name, salary, benefits, education, work experience), including information about contractors or job applicants. The information is used to manage the employment relationship and job application process.

If you are an Employee, please consult the internal version of Mastercard BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our BCRs. We will

provide you with a copy of our internal Mastercard BCRs upon request if you e-mail us at privacyanddataprotection@mastercard.com.

For our "core" payment processing activities, Mastercard acts as Data Processor on behalf of our financial institutions, merchants, customers and partners. For other activities such as programs offered directly to Individuals or employment-related activities, Mastercard acts as Data Controller. Mastercard has established a comprehensive privacy and data protection program and applies a holistic approach whether we act as Data Processor or Data Controller.

Mastercard is committed to comply with EU Data Protection Law, in particular the GDPR (as amended and replaced from time to time) and the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC and replaced from time to time), as implemented into applicable national legislation.

Mastercard's Binding Corporate Rules ("BCRs") are part of our privacy and data protection program and are aimed at facilitating the transfer of Personal Information to and among Mastercard BCRs entities worldwide in compliance with EU Data Protection Law. However, where the applicable legislation, for instance applicable national data protection law, requires a higher level of protection for Personal Information, it will take precedence over the BCRs.

Our BCRs cover data Processing activities where we act either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules specified in our BCRs apply to both types of activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor. Our BCRs include BCRs for Data Controllers (BCR-C) and BCRs for Data Processors (BCR-P). The BCR-C govern transfers of Personal Information from Data Controllers to other Data Controllers or Data Processors within the Mastercard group. The BCR-P govern transfers of Personal Information Processed by Mastercard BCR entities acting as Data Processors on behalf of a third-party Data Controller.

At Mastercard, Personal Information is:

- **Processed fairly and in a transparent manner**
- **Processed only if Mastercard can rely on a valid legal ground**
- **Protected with additional safeguards if it is considered to be Sensitive Information**
- **Adequate, relevant and not excessive, kept accurate and up-to-date**
- **Processed for specified and compatible purposes, and not retained unnecessarily**
- **Processed in accordance with Individuals' rights**
- **Only used for automated processing in compliance with the law**
- **Processed using operational and technical safeguards**
- **Only processed by Processors if adequate protections exist**

Mastercard Europe SA, Chaussée de Tervuren 198A, 1410 Waterloo, Belgium, is the entity responsible for compliance with the BCRs and accepts liability for any breach of the BCRs caused by another Mastercard entity located within or outside the EEA, including any Data Processor or Sub-Processor used by Mastercard. The SA competent for the supervision of Mastercard Europe SA is the Belgian SA.

In addition, in the EU, Mastercard is subject to regulatory oversight, including but not limited to the

oversight of the European Central Bank ("ECB") and the National Bank of Belgium ("NBB"). Mastercard entities may also be subject to other oversight in the EU under applicable regimes.

All Mastercard BCRs Entities are bound to comply with the BCRs requirements by an Intra- group Agreement. The Privacy & Data Protection Team will ensure compliance with the BCRs under Senior Executive oversight as well as internal and external reviews and audits.

Individuals have the right to lodge a complaint with the Belgian SA or with the Supervisory Authority of their country of residence, place of work or place of alleged infringement if they believe that the BCRs have been breached.

Please refer to Glossary for capitalized terms used in this document.

II. Duty To Respect The BCRs

The BCRs set the standards that Mastercard satisfies when processing Personal Information about Individuals either as a Data Controller or as a Data Processor.

Mastercard's BCRs are binding on all Mastercard BCRs Entities and on all Mastercard Staff Processing Personal Information as follows:

- The Mastercard BCRs Entities are bound by an Intra-group Agreement to respect the BCRs. The Mastercard BCR Entities that are covered by the BCRs and have signed Mastercard's Intra-group Agreement are listed in **Appendix 1**.

- The Mastercard Staff are bound by the BCRs in two ways. First, the Mastercard Staff are required to sign a binding employment contract, which requires employees to comply with the Code of Conduct, all Mastercard policies, and a duty not to disclose or misuse Personal Information. In addition, the Mastercard Staff is required to sign a declaration that they abide by the Code of Conduct and recertify adherence to the Code of Conduct on an annual basis. Adherence to the Code of Conduct requires adherence to all Mastercard's policies, including Mastercard BCRs.

III. What Do Our BCRs Cover?

Mastercard's BCRs apply to all Mastercard BCRs Entities that process Personal Information either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules of our BCRs apply to both types of Processing activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

1. Geographical Scope

Our BCRs cover all Processing of Personal Information, which is or was subject to EU Data Protection Law, and is conducted by Mastercard BCRs Entities worldwide, including the Processing of Personal Information that is transferred and processed by a Mastercard BCRs Entity out of the EEA and the Processing of Personal Information that was subject to EU Data Protection Law and is onward transferred from a country outside the EEA. Our BCRs apply to all Mastercard BCRs Entities worldwide; a list of countries where Personal Information may be transferred is attached in Appendix 1. Each of the transfers that are described in the table in Section III.2 may be carried out to all the countries listed in Appendix 1. In addition, our BCRs are applicable in those jurisdictions that recognize our BCRs as guaranteeing an adequate level of data protection for the transfer of Personal Information outside the respective jurisdiction (e.g., Switzerland in accordance with the Swiss Federal Data Protection Act).

2. Material Scope

Our BCRs cover the Processing of Personal Information described in this section.

Mastercard receives most of its data when it processes payment transactions; however, we receive a limited number of Personal Information to process these payment transactions. When we process payment

transactions, we typically receive the following Personal Information: the personal account number, the merchant name and location, the date, time and the total amount of the transaction. Except as otherwise indicated in the chart below, we do not receive the cardholder's name or other contact information. Nor do we receive information about the type of product or service that is purchased.

In addition to our core payment transaction processing activities, we also:

- offer engagement programs, such as loyalty and rewards programs. To enable such programs, we collect Personal Information, such as the Individual's name and their email address. Individuals are provided with a privacy notice for these programs, which describes the type of Personal Information we collect and how we process it. Personal Information is collected directly from Individuals or provided by Mastercard customers. We keep the Personal Information collected in the context of such programs segregated from Personal Information processed for payment processing, unless otherwise specified in the program-specific privacy notice.

- offer debit payment and cheque processing services. When we process Personal Information for debit payment and cheque processing services, we may process additional Personal Information such as the Individual's name, information that relates to the financial institutions (e.g., sort code), any reference in a free text field, the Individual's signature, and in limited situations other unique identifiers.

- offer fraud prevention and detection services. Mastercard collects and processes Personal Information of Individuals, such as IP address, physical address and phone number, to prevent, identify, detect, and protect against any type of fraud. We may share such Personal Information with customers as part of our fraud prevention and identity verification services.

- offer open banking services. When we process Personal Information either for ASPSPs and TPPs or at the request of business customers or the Individual we may process additional Personal Information, such as an Individual's bank account details, transaction data, the type of open banking service requested, and other identifiers. Where we act as a Data Controller, Individuals are provided with a privacy notice specific to the open banking services.

In more detail, we process the following categories of Personal Information, depending on the type of services provided, whether we act as a Data Controller or a Data Processor, the purpose of the Processing and the categories of Individuals:

Mastercard's Role	**Purposes**	**Types of Personal Information**
Processor	Authorizing, clearing and settling transactions on behalf of our financial institutions, merchants, customers and partners.	Personal Information of **cardholders and other Individuals**, such as: • Card data (e.g., card expiration date, Card Verification Value (CVV) and Card country code). • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant), card expiration date, Card Verification Value, card country code). • Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number, free text reference, Individuals' signature for cheque and other unique identifiers).

Mastercard's Role	Purposes	Types of Personal Information
Processor	Cross-border and domestic account to account payments on behalf of our financial institutions and corporate customers	Personal Information of **account holders, beneficiaries and other Individuals**, such as: • Data related to fund transfers (e.g., personal account number, associated codes, name and location of the payee). • Contact information (e.g., name, phone number) as well as other information (e.g., date of birth, government ID) when provided by financial institutions and corporate customers.
Processor	Supporting our customers' issuing and acquiring business.	Personal Information of **cardholders**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Contact information (e.g., name, postal or email address, phone number) as well as other information (e.g., date of birth, gender, government ID) as/when provided by cardholders (for card registration purposes), issuers and acquirers. • Additional information provided by cardholders or merchants (e.g., delivery address, product codes). Personal Information of staff at **financial institutions and merchants**, such as: • Contact information (e.g., business email address, business postal address, business telephone number, job title). • Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.
Controller or Processor depending on activity	Preventing cardholder disputes and facilitating cardholder dispute resolution and chargeback procedures	Personal Information of **cardholders and other Individuals**, such as: • Data necessary for cardholder dispute resolution (e.g., transaction data, such as personal account number and date/time/amount/location/currency of the transaction; cardholder contact information; device-related information; merchant details; order details (e.g., items purchased); information about the dispute, and other unique identifiers for payment and cheque processing services).
Controller or Processor	Enabling the connectivity,	Personal Information of **Individuals**; • Account and payment data (e.g.,

Mastercard's Role	Purposes	Types of Personal Information
depending on activity	maintenance and operation of our open banking services	transaction data, such as personal account number, date/time/amount/description of the transaction, name and location of the payee), as well as other financial information. • Open banking request and response information (e.g., requests and responses, Account Information Service requests and responses, request reference number, and response status). • Electronic identification data (e.g., username, password, country of residence, security questions, IP address, logs). • Device-related information (e.g., user device IDs). Personal Information of staff at **ASPSPs, TPPs, financial institutions and customers**, such as: • Contact information (e.g., business email address, business postal address, business telephone number, job title). • Electronic identification data (e.g., username, password, security questions, IP address).
Controller	Accounting, auditing and billing.	Personal Information data of **staff at financial institutions, merchants, customers and partners**, such as: • Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title). • Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.
Controller	Managing customer relationships and financial reporting, including relationships with financial institutions, merchants, customers and partners.	Personal Information of **staff at financial institutions, merchants, customers and partners**, such as: • Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title). • Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.

Mastercard's Role	Purposes	Types of Personal Information
Controller	Managing suppliers and vendors.	Personal Information of **staff at suppliers and vendors**, such as: • Contact information of persons at suppliers and vendors (e.g., business email address, business postal address, business telephone number, job title).
Controller	Marketing activities of Mastercard or our customers, including offers, sweepstakes, contests and promotions.	Personal Information of **consumers and website users (whether or not cardholders)**, such as: • Contact information (e.g., name, postal or email address, phone number). • Electronic identification data (e.g., username, password, security questions, IP address). • Device-related information (e.g., user device IDs, browser information, online identifiers, user interactions with and preferences on websites and applications). • Data collected in the context of online marketing programs and other promotional activities, such as contests) and other promotional activities, such as contests) (e.g., personal characteristics, life habits, consumption habits, interests, geo-location data, and voice and image recordings, contest responses).
Controller	Compliance with Applicable Law, regulations and law enforcement requests.	Personal Information of **Individuals, cardholders and staff at financial institutions, merchants, customers and partners**, such as: • Data required for legal compliance (e.g., know your customer information for anti-money laundering compliance, responding to Individuals' requests).
Controller	Talent acquisition and Employment-related purposes, such as managing Mastercard's workforce, work planning, training and development, talent management, facilitating communication with and between the workforce, managing	Personal Information of prospects, candidates, former and current **Employees and other Mastercard staff**, such as: • Contact information (e.g., name, address, email address and telephone number, date and place of birth, Social Security number or other national identification number). • Payroll data (e.g., banking details, corporate credit card number and transaction details). • Information on an Individual's position

Mastercard's Role	Purposes	Types of Personal Information
	emergencies (such as ensuring business continuity and protecting health and safety), Human Resources administration (including payroll and compensation management), maintaining a directory of former employees and Prospects.	(e.g., current position, title, salary plan, pay grade or level, employee ID). • Talent management information (e.g., application information, resume/CV, previous employment background, education history). • Applicant data (e.g., current and previous employers, job titles, dates of employment, resume/CV information). • Compensation information (e.g., base salary, bonus, benefits, pay enhancements for dependents, performance appraisals). • Internal reports and compliance information (reports on compliance and disciplinary issues within the organization, including gift logs and, where applicable, whistleblowing reports). • Management records (details of any shares of common stock or directorships).
Controller	Corporate security purposes, such as integration planning and controlling security of premises and logical systems	• System and application data of Employees and other staff, as well as security control data (including any information required to access company systems and applications, information about employees' use of technology resources, and photographs and other visual images, such as CCTV images). • Visitor data (e.g., registration data, CCTV images).
Controller or Processor depending on activity	Fraud prevention and detection, cybersecurity and cyber resilience, authentication, digital identity, financial crime, identity verification and risk management.	Personal Information of **cardholders and other Individuals**, such as: • Fraud related payment data (e.g., personal account number, date/time/amount of the transaction, items purchased, name, merchant's details and location). • Biometric data for authentication purposes (e.g., photographs, voice, fingerprint). • Online fraud and authentication data (e.g., IP address, users' details, such as name, email address, physical address and phone number, merchants' details and, online behaviour). • Cybersecurity and cyber resilience related data (e.g., IP addresses, IP header, source/destination port, TCP/UDP headers). • Information gathered from the blockchain

Mastercard's Role	Purposes	Types of Personal Information
		(e.g., blockchain address, IP address) and cryptocurrency transaction data (e.g., date/time/amount of the transaction, transaction unique identifier, balance or amount attached to the blockchain address, participating blockchain addresses, and location. • Contact information (e.g., name, address), as well as ID cards, where permitted by and in accordance with Applicable Law in the EEA, and reason codes when attributed to sole proprietor merchants. • Device-related information (e.g., user device IDs, browser information, user interactions with the device, website and applications). • Financial crime data (e.g., data about money laundering, terrorist financing, bribery, corruption and other unlawful activities) both on traditional rails and cryptocurrency. • Location data. • Fraud score, type of fraudulent activity and confirmed fraudulent activity, validation of identity verification. • Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number and other unique identifiers, free text reference, Individuals' signature for cheques). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners, and data derived from our analysis of such information.
Controller	Internal research, reporting and analysis	Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Controller or Processor depending on activity	Providing products and services benefiting Individuals, including rewards programs,	Personal Information of **cardholders and other Individuals**, such as: • Loyalty and rewards data (e.g., cardholder

Mastercard's Role	Purposes	Types of Personal Information
	eWallets, tokenization services, prepaid services and processing donations.	name, e- mail address, billing or shipping address, phone number, personal account number, transaction data). • Device-related information (e.g., user device IDs, browser information, online identifiers). • User engagement data (e.g., user interactions with and preferences on websites and applications). • e-Wallet and prepaid registration data, and tokenized payment credentials (e.g., cardholder name, e- mail address, billing or shipping address, verification code), phone number, personal account number, card expiration date, card verification code, and transaction data. • Biometric data for authentication purposes (e.g., photographs). • Non-biometric data for authentication purposes (e.g., authentication methodology, authentication confirmation). • Client relationship management data and other data that a customer provides in the context of the services (e.g., loyalty status).
Controller or Processor depending on activity	Providing products and services directly to financial institutions, corporate clients, merchants, customers and partners, including statistical reports and tools, prepaid management services, customer service support.	Personal Information of **staff at financial institutions, corporate clients, merchants, customers and partners**, such as: • Contact information or identifying details of persons at financial institutions, corporate clients, merchants, customers and partners (including but not limited to business or personal email address, business or personal postal address, business or personal telephone number, job title, date of birth, country of origin, social media accounts and information, IP addresses). • Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers. Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Data received for cardholder support (e.g., data received at a call centre) or cardholder

Mastercard's Role	Purposes	Types of Personal Information
		services (i.e., data to support emergency card replacement services). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Processor	Providing data analytics products and services to financial institutions, merchants, corporate clients and partners with their instructions.	Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Controller	Anonymising data for the purposes of developing and providing data analytics products and services	Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Controller	Establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies	Personal Information of **Individuals, cardholders and staff at financial institutions, merchants, customers and partners**, such as: • Data required to establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies.

If you are an Employee, please consult the internal version of Mastercard BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our BCRs. We will provide you with a copy of our internal Mastercard BCRs upon request if you e-mail us at privacyanddataprotection@mastercard.com.

IV. How Do We Protect Personal Information?

Personal Information is key to Mastercard's business activities. For our business to function we must handle Personal Information with keen sensitivity to privacy and security standards in order to protect Personal Information on behalf of all the members of our global payment network. Our company is committed to the protection of Personal Information and to compliance with relevant laws.

Mastercard first and foremost complies with applicable data protection law. The Mastercard BCRs Entities comply with EU data protection principles both when we act as a Data Controller and where we act as a Data Processor. However, where applicable national data protection law requires a higher level of protection for Personal Information, it will take precedence over the BCRs.

- When we act as a Data Controller, we establish processes and procedures to ensure compliance with all requirements of EU Data Protection Law.

- Where we act as a Data Processor, we process Personal Information on behalf of the Data Controller and upon its instructions as provided in the Mastercard Rules or in a specific agreement between Mastercard and the Data Controller.

We only transfer Personal Information to Mastercard Entities that are effectively bound by the BCRs and can demonstrate compliance with the requirements set out in these BCRs.

The following describes how we respect the principles of EU Data Protection Law, including how we cooperate with our customers to ensure respect of those principles:

1. Transparency, Easy Access To The BCRs & Fairness

The Mastercard BCRs Entities provide Individuals with clear information on how we process Personal Information.

Transparency is a key value at Mastercard. We provide Individuals with a number of online and offline privacy notices, including our Global Privacy Notice and program-specific privacy notices. All our privacy notices include, at the minimum, the information required by the GDPR (such as the identity and contact details of the controller and the Europe Data Protection Officer, the purpose(s) of the Processing and related legal grounds, the categories data recipients, and data transfers), and a link to the BCRs.

Our BCRs inform Individuals about:

(i) the scope of the BCR-C and BCR-P (Section III);

(ii) the data protection principles we apply when processing Personal Information (Section IV);

(iii) the liability regime applicable to such Processing (Section VI);

(iv) their third party beneficiary rights with regard to such Processing and how to exercise those rights (Section VI.2).

All Individuals have the right to easily access the BCRs. A public version of the complete BCRs will be published on Mastercard's public website, and the complete Mastercard BCRs will be available on Mastercard's intranet.

2. Legal Ground For Processing

The Mastercard BCRs Entities only process Personal Information if they can rely on one of the limited legal grounds provided by EU Data Protection Law.

When a Mastercard BCRs Entity acts as a Data Controller, our Privacy & Data Protection Team reviews

Personal Information Processing operations and ensures that the Processing is based on a legal ground for processing Personal Information, including for example:

- Individuals have unambiguously given their consent to the Processing of Personal Information;
- The Processing is necessary for the performance of a contract to which the Individual is a party or in order to take steps at the request of the Individual prior to entering into a contract;
- The Processing is necessary for compliance with a legal obligation or other regulatory obligations; or
- The Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by the third party or parties to whom Personal Information is disclosed, except where such interests are overridden by the interests or fundamental rights and freedoms of the Individual.

Where we act as Data Processor, we process Personal Information at the direction of the Data Controller who is responsible for ensuring a valid legal ground for the Processing.

3. Sensitive Data

The Mastercard BCRs Entities only collect Sensitive Data when absolutely necessary for the purpose of the Processing and if they can rely on one of the limited legal grounds provided under EU Data Protection Law.

Certain categories of Personal Information are Sensitive Data and receive a higher level of protection under EU Data Protection Law.

When a Mastercard BCRs Entity acts as a Data Controller, we process Sensitive Data only in limited circumstances, and will not process Sensitive Data unless the Processing is based on a legal ground for processing Sensitive Data, including for example:

- Individuals have given their explicit consent to the Processing;
- The Processing relates to Sensitive Data which is manifestly made public by the Individual;
- The Processing is necessary for the establishment, exercise or defence of legal claims by Mastercard;
- The Processing is necessary for the purpose of carrying out the obligations and specific rights of Mastercard in the field of employment law;
- The Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR based on EEA or Member State law; or
- The Processing is necessary to protect the vital interests of the Individuals or another person where the Individual is legally or physically incapable of giving his or her consent.

4. Data Quality

The Mastercard BCRs Entities comply with the data quality principle.

When a Mastercard BCRs Entity acts as a Data Controller:

- The Mastercard BCRs Entities ensures that Personal Information is:
    - Kept up-to-date (data accuracy);
    - Adequate, relevant and not excessive in relation to the purpose for which the information was collected and processed (data minimization);

- Not retained for longer than is necessary for the purpose(s) for which it was originally collected, unless legislation requires us to maintain it (limited storage periods).

- Our transaction processing system is designed to minimize the amount of Personal Information collected and for that purpose relies primarily on the personal account number (and not on other directly identifiable information).

- We have implemented a records retention policy that sets out the appropriate time periods for which the Mastercard BCRs Entities will retain data, including Personal Information, in accordance with Applicable Law in the country of the concerned Mastercard BCRs Entity.

When a Mastercard BCRs Entity acts as a Data Processor, it will cooperate with and assist the Data Controller to comply with EU Data Protection Law, in particular it will comply with requests from the Data Controller:

- To update, correct or delete Personal Information, and will inform all Mastercard BCRs Entities to whom the data have been disclosed of the required update, correction or deletion of the Personal Information.

- To delete or anonymize the Personal Information as of the date when there is no justification to the retention of the data in an identified format, and will inform all Mastercard BCRs Entities to whom the Personal Information have been disclosed of the required deletion or anonymization of the Personal Information.

The Mastercard BCRs Entity acting as a Data Processor will comply with the above requests unless legislation imposed upon the Mastercard BCRs Entity prevents it from returning or destroying all or part of the Personal Information, in which case it will protect the confidentiality of the Personal Information and will not actively process it anymore.

5. Purpose Limitation

Mastercard BCRs Entities only collect Personal Information for specified, explicit and legitimate purposes and do not further process it in a way incompatible with those purposes.

When a Mastercard BCRs Entity acts as a Data Controller, we ensure that Personal Information is collected and processed only for specific and legitimate purposes and that it is not further processed in ways incompatible with the purposes of the collection.

One of the ways Mastercard ensures compliance with this principle is by embedding privacy and data protection standards into the product development lifecycle. As part of our product development process, the Privacy & Data Protection Team reviews the collection and use of Personal Information on a case-by-case basis to ensure that the Processing is undertaken for specific and legitimate purposes and is compatible with the purpose for which the Personal Information was collected. We embed these requirements into our technology wherever feasible to do so.

When a Mastercard BCRs Entity acts as a Data Processor, we comply with the following requirements:

- We only process Personal Information on behalf of the Data Controller and in compliance with its instructions, including with regard to transfers of Personal Information to a third country. If a Mastercard BCRs Entity cannot comply with the Data Controller's instructions, it will inform promptly the Data Controller of its inability to comply, if possible before the Processing takes place, and unless a law prohibits such notice on important grounds of public interest. Once the Data Controller is notified, it is entitled to suspend the transfer of Personal Information and/or terminate the contract.

- We take steps to return, destroy or fully anonymize the Personal Information of our customers, acting as Data Controllers, on the termination of the provision of services related to the data

Processing, unless otherwise legally permitted to continue processing the data (in which case we will only process the data to the strict extent permitted by Applicable Law in the EEA).

- We fully cooperate with our customers to assist them in their role as Data Controllers to fulfil their data protection compliance obligations in accordance with EU Data Protection Law.

- When we use our Sub-Processors, including internal Sub-Processors, we make sure they process the Personal Information in line with the instructions of our customers acting as Data Controllers.

6. Rights Of Individuals

The Mastercard BCRs Entities comply with Individuals' requests to exercise their rights under EU Data Protection Law.

In addition to the general right of information set out in Section IV.1, when a Mastercard BCRs Entity acts as a Data Controller, we ensure that Individuals can exercise their right to:

- Access copies of Personal Information relating to them and receive the Personal Information in a structured, commonly used and machine-readable format to transmit it to another Data Controller;

- Obtain rectification or erasure of Personal Information relating to them or restriction of the Processing and to be notified of any changes made following such a request;

- Object, on grounds relating to their particular situation, to the Processing of their Personal Information;

- Object to the Processing of their Personal Information for the purpose of direct marketing.

Where we act as Data Processor, we require our customers to develop and implement appropriate procedures for handling Individuals' requests exercising their rights to access, rectify, or erase their Personal Information, restrict or object to the Processing of their Personal Information, or exercise their right to data portability. We do not reply to Individuals' requests to exercise their rights unless authorized or required to do so by our customers, but instead transmit them to our customers. We cooperate and support our customers in responding to such Individuals' requests, and have implemented technical and organizational measures for that purpose.

7. Automated Decision Making

The Mastercard BCRs Entities comply with the restrictions applicable to automated decisions making under EU Data Protection Law.

When a Mastercard BCRs Entity acts as a Data Controller, we ensure that Individuals are not subject to a decision which produces legal effects or that similarly significantly affects them and which is based solely on automated Processing of Personal Information, including Processing intended to evaluate certain personal aspects relating to them, such as their performance at work, creditworthiness, reliability, conduct, unless the Processing is:

- Necessary for entering into or performing a contract between the Individual and Mastercard;

- Authorized by a law requiring that measures be implemented to safeguard the Individual's legitimate interests.

- Authorized by the Individual who has provided his or her explicit consent to such Processing.

When the processing is based on Individuals' consent or is necessary for entering into or performing a contract, Mastercard will implement safeguards to protect Individuals' rights, freedoms and legitimate interest, at least the right to obtain human intervention, to express his or her point of view and to contest the decision.

8. Data Security

The Mastercard BCRs Entities implement appropriate technical and organizational measures to protect Personal Information.

Information security is at the heart of Mastercard's business model. Mastercard continuously innovates to make electronic payments even more secure. Mastercard has introduced chip and pin technology and more recently the digitization and tokenization of payment cards on electronic devices. Mastercard and its peers developed the industry standard for the protection of payment card data (Payment Card Industry PCI data security standards) that is used globally by all parties involved in processing card transactions, including financial institutions and merchants.

Mastercard has implemented and commits to maintain a comprehensive written information security program that complies with EU Data Protection Law, as well as all other applicable privacy, data protection and information security requirements, including U.S. banking safety and security standards. Mastercard is audited for compliance with those banking security standards by U.S. banking regulators on an annual basis. In addition, Mastercard's information security program is audited by an independent third party auditor on an annual basis in accordance with established audit standards (SSAE 16).

Mastercard commits to implement state-of-the-art measures to secure Personal Information. In particular, Mastercard's information security program includes appropriate technical, physical, administrative, and organizational measures and safeguards designed to:

- Ensure the security and confidentiality of Personal Information;
- Protect against anticipated threats or hazards to the security and integrity of Personal Information;
- Protect against any actual or suspected accidental or unlawful destruction, loss, alteration, unauthorized disclosure, acquisition, use or access or any other unlawful forms of Processing of any Personal Information transmitted, stored or otherwise processed.

These measures include the following controls:

- Access controls of persons;
- Data media controls;
- Data memory controls;
- User controls;
- Personal controls;
- Access controls of data;
- Transmission controls;
- Input controls;
- Instructional controls.

For situations where a Mastercard BCRs Entity acts as a Data Controller, Mastercard's information security program ensures a level of security appropriate to the risks for the rights and freedoms of natural persons and taking into account the nature of the data, as well as the state of the art and cost of implementation of those safeguards. Our program is reviewed at least annually to ensure that it is responsive to new and emerging threats to security. Where Sensitive Data is processed, Mastercard implements enhanced security measures as appropriate to the heightened risks of the Processing. We also require our Data Processors or Sub-Processors to maintain strong information security safeguards.

Where a Mastercard BCRs Entity acts as Data Processor, Mastercard BCRs Entity implements appropriate technical and organizational measures to ensure a level of security appropriate to the risks for the rights and freedoms of natural persons in accordance with the GDPR, in particular:

- Mastercard BCRs Entity and its Sub-Processors assist the Data Controller in ensuring compliance with its obligations regarding the security of Processing (Art. 32 of the GDPR), notification of a Personal Data Breach to the Competent SA and to Individuals, where applicable (Art. 33 and 34 of the GDPR), and carrying out a Data Protection Impact Assessment and prior consultation with the Competent SA, where applicable, as outlined in Articles 35 to 36 of the GDPR, taking into account the nature of the Processing and information available.

- Mastercard BCRs Entity and its Sub-Processors comply with security obligations equivalent to those imposed on the Data Controller by EU Data Protection Law, in accordance with the Mastercard Rules.

In case of Personal Data Breach, all Mastercard BCRs Entities will notify without undue delay the Privacy and Data Protection Team and Mastercard's Europe Data Protection Officer, Mastercard Europe SA, as appropriate, any Mastercard BCRs Entity acting as a Data Controller and will document the Personal Data Breach. This documentation will be made available to the Competent SA upon request. We will notify a Personal Data Breach as follows:

- Where the Personal Data Breach is likely to result in a risk to Individuals' rights and freedoms, we will notify the Competent SA without undue delay, and, where feasible, not later than 72 hours after having become aware of the Personal Data Breach.

- When the Personal Data Breach is likely to result in a high risk to Individuals' rights and freedoms we will also notify Individuals of the Personal Data Breach without undue delay. The notification shall communicate the name and contact details of the Europe Data Protection Officer ("DPO") or other contact point and describe in clear and plain language the nature of the Personal Data Breach, its likely consequences and the measures (proposed to be) taken by the Data Controller to address it, including, where appropriate, measures to mitigate its possible adverse effects as outlined in Article 33(3) of the GDPR.

- When a Mastercard BCRs Entity acts as a Data Processor, that Mastercard BCRs Entity informs the Data Controller without undue delay after becoming aware of any Personal Data Breach.

9. Onward Transfers

The Mastercard BCRs Entities only complete onward transfers to a Data Controller, a Data Processor or a Sub-Processor in compliance with the BCRs and the GDPR requirements applicable to Data Processors and Data Transfers.

A. Onward Transfers To Data Controllers And Data Processors

The following section applies when Mastercard acts as a Data Controller.

The Mastercard BCRs Entities only communicate Personal Information to: (1) another Mastercard Data Controller in compliance with the BCRs, including with the transparency requirements and purpose limitation principle; and (2) a non-Mastercard Data Controller located outside of the EEA if it complies with EU Data Protection Law and with the legal requirements applicable to data transfers (in particular Articles 44, 45, 46 and 47 of the GDPR).

In addition, any Data Processor, including an internal Data Processor (i.e., a Mastercard BCRs Entity) and an external Data Processor (i.e., non-Mastercard entity or a Mastercard entity which is not bound by the Mastercard BCRs), who may receive or process Personal Information on behalf of a Mastercard BCRs Entity is subject to a rigorous due diligence process. The facts gathering and the security aspect of the diligence process is led by Third Party Risk Management (TPRM), in collaboration with the Privacy & Data Protection Team. The findings of the due diligence are reviewed by the Privacy & Data Protection Team to

ensure that our Data Processors apply appropriate protections to the data and that Mastercard complies with the legal requirements applicable to Data Processors and data transfers (in particular Articles 28, 29, 32, 44, 45, 46 and 47 of the GDPR). The result of the diligence process is documented in a report, which includes any required risk mitigation measures. The process is repeated on an annual basis.
In particular, the Privacy & Data Protection Team ensures that:

- Where a Mastercard BCRs Entity uses an internal Data Processor to process Personal Information on its behalf and under its instructions, the Processing takes place in accordance with the BCRs.

- Where a Mastercard BCRs Entity uses an internal or external Data Processor to process Personal Information on its behalf, the Data Processor is bound by way of a written agreement to comply with data protection obligations in accordance with Article 28 of the GDPR, including:

    - Process Personal Information only on behalf of and under the instructions of the Mastercard BCRs Entity which acts as the Data Controller;

    - Implement and maintain appropriate technical and organizational measures to protect Personal Information against unauthorized access or disclosure, including by way of a comprehensive written information security program. Having regard to the state of the art and the cost of their implementation, such measures ensure a level of security appropriate to the risks for the rights and freedoms of natural persons and the nature of the Personal Information to be protected.

    - Inform the Mastercard BCRs Entity if it cannot comply with its data protection obligations, when there is a Personal Data Breach, an information security incident, or when it receives requests from Individuals or from a public authority;

    - Only transfer Personal Information out of the EEA in compliance with Articles 44, 45, 46 and 47 of the GDPR;

    - Only sub-contract the Processing of Personal Information with the prior written consent of the Mastercard BCRs Entity which acts as the Data Controller and under an agreement that imposes on the Sub-Processor the same data protection obligations as set out in the contract between the Mastercard BCRs Entity and the Data Processor;

    - Ensure that persons authorized to process the Personal Information have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;

    - Assist the Mastercard BCRs Entity to ensure compliance with its obligations pertaining to the security of the Personal Information, including any required notification of a Personal Data Breach, data protection impact assessments and related prior consultations;

    - At the choice of the Mastercard BCRs Entity, delete or return the Personal Information to the Mastercard BCRs Entity after the end of the provision of the services;

    - Make available to the Mastercard BCRs Entity information necessary to demonstrate compliance with its obligations under the agreement and inform the Mastercard BCRs Entity if, in its opinion, an instruction infringes EU Data Protection Law;

    - Remain liable to the Data Controller for the performance of the Data Processor's obligations.

B. Onward Transfers To Sub-Processors

The following section applies when Mastercard acts as a Data Processor.

The Mastercard BCRs Entities only use internal Sub-Processors (i.e., a Mastercard BCRs Entity) or external

Sub-Processors (non-Mastercard entities) in accordance with the Data Controller's instructions and the informed general or specific authorization provided in the Mastercard Rules or the specific data processing agreement between the Data Controller and the Mastercard BCRs Entity.

When we use external Sub-Processors, we bind them via a written agreement to ensure that they comply with the same obligations as are imposed by the Mastercard BCRs on Mastercard, via the Mastercard Rules or the specific agreement between the Data Controller and the Mastercard BCRs Entity acting as Data Processor.

When the Data Controller gives a general authorization to the Mastercard BCRs Entity to use Sub-Processors, the Mastercard BCRs Entity commits to provide the Data Controller with a list of Sub-Processors and to inform the Data Controller of any addition or replacement of a Sub- Processor in a timely fashion so as to give the Data Controller an opportunity to object to the change or to terminate the contract before the Personal Information is communicated to the new Sub-Processor, except where the service cannot be provided without the involvement of a specific Sub-Processor.

In addition, Mastercard complies with the following requirements when sub-processing Personal Information:

- Our internal Sub-Processors are bound to respect our BCRs and only process Personal Information in line with the instructions of the Data Controllers which are specified in the Mastercard Rules or in a specific agreement.

- The Privacy & Data Protection Team ensures that Mastercard BCRs Entities only use Sub-Processors when appropriate data protection guarantees are implemented in accordance with Articles 28, 29, 32, 45, 46, 47 of the GDPR, in compliance with the Data Controller's instructions and prior authorization and the requirements outlined above for agreements with external Data Processors.

10. Accountability

Where we act as Data Controller, we implement appropriate technical and organizational measures to ensure and to be able to demonstrate compliance with the BCRs, in particular:

- We carry out data protection impact assessments for Processing operations that are likely to result in a high risk to the rights and freedoms of Individuals and consult the relevant SA, prior to processing, where the assessment indicates that the Processing would result in a high risk to the rights and freedoms of Individuals in the absence of measures taken by the controller to mitigate the risk. .

- We implement appropriate technical and organizational measures designed to implement data protection principles and to facilitate compliance with the requirements set up by the BCRs (data protection by design and by default).

When we act as a Data Processor:

- We make available to the Data Controller information necessary to demonstrate compliance with its obligations and allow for and contribute to audits as provided in our BCRs.

- We inform the Data Controller if, in our opinion, an instruction infringes EU Data Protection Law.

- We assist the Data Controller in implementing appropriate technical and organizational measures to comply with data protection principles and facilitate compliance with the requirements set up by the BCRs, such as data protection by design and by default.

Whether we act as a Data Controller or a Data Processor, we maintain records of Processing activities and make it available to the relevant SA upon request.

The records we maintain as a Data Controller contain the following information: (i) name and contact details of the controller and, where applicable, joint controller, representative and Europe Data Protection Officer; (ii) purposes of the Processing; (iii) a description of the categories of Individuals and of Personal Information; (iv) categories of recipients; (v) transfers of Personal Information; (vi) where possible, the envisaged time limits for erasure of the different categories of Personal Information; and where possible, (vii) a general description of the technical and organizational security measures.

The records that we maintain as a Data Processor contain the following information: (i) the name and contact details of the processor and of each controller on behalf of which we are acting, and, where applicable, of the representative, and data protection officer; (ii) the categories of Processing carried out on behalf of the controller; (iii) transfers of Personal Information; and where possible (iv) a general description of the technical and organizational security measures.

V. How Do We Ensure Privacy Compliance?

The Privacy & Data Protection Team is responsible to ensure compliance with the BCRs requirements under senior executive oversight. Mastercard has a global team of dedicated privacy, data protection and security professionals responsible for administering our privacy and data protection programs, which may be contacted as set out in these BCRs.

Mastercard provides regular privacy and data protection training and awareness to Mastercard Staff globally, and all Mastercard Staff are required to comply with Mastercard's data protection policies and procedures. Mastercard's privacy and data protection program is subject to regular internal and external reviews and audits.

1. The Mastercard Privacy & Data Protection Team

The Privacy & Data Protection Team is in charge of ensuring compliance with the BCRs requirement and is led by Mastercard's Chief Privacy Officer who is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

Mastercard ensures that the Privacy & Data Protection Team has enough human and financial resources to complete its tasks efficiently and in accordance with EU Data Protection Law. In particular, the Privacy & Data Protection Team is composed of a network of qualified data professionals as well as privacy and data protection lawyers devoting 100% of their time to privacy and data protection law. They are located in Mastercard main offices worldwide, including in the U.S., Belgium, the UK and Singapore. Senior privacy & data protection lawyers are in charge of supervising and coordinating compliance with applicable data protection rules globally. They report to Mastercard's Chief Privacy Officer and are assisted by mid-level and junior privacy and data protection lawyers. The exact structure of the Privacy & Data Protection Team is subject to change as Mastercard business evolves rapidly. An organigram of the Privacy & Data Protection Team is available upon request.

The Privacy & Data Protection Team is responsible for ensuring that the Processing of Personal Information by the Mastercard BCRs Entities is legally compliant, as well as ethical. Accordingly, the team is responsible for:

- Supervising and implementing the BCRs;
- Ensuring compliance with the requirements of the BCRs;
- Updating the BCRs in compliance with internal governance procedures;
- Handling requests and complaints of Individuals in relation to the BCRs.

2. Senior Executive Oversight

Mastercard's commitment to privacy starts at the highest levels of the organization, with our Board of

Directors, Chief Executive Officer, General Counsel, Executive Vice President Chief Data Officer, Executive Vice President Chief Privacy Officer and our Executive Vice President Chief Security Officer. Mastercard's Chief Privacy Officer is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

3. Data Protection Officer

Mastercard has appointed a DPO, who monitors compliance with the BCRs and is responsible for the following tasks:

- Informing and advising Mastercard and Mastercard Staff in all matters related to the Processing of Personal Information and their obligations under EU Data Protection Law;
- Monitoring compliance with EU Data Protection Law and Mastercard's policies, including the assignment of responsibilities, awareness-raising and training of Mastercard Staff involved with the Processing of Personal Information and related audits;
- Providing advice regarding data protection impact assessments upon request;
- Acting as a contact point for Individuals in relation to all issues related to the Processing of their Personal Information and to the exercise of their rights under EU Data Protection Law;
- Cooperating with SAs, for which he or she may act as a contact point.

The DPO has been provided with the necessary resources to carry out his or her tasks. He or she enjoys the highest management support for the fulfilment of these tasks and does not receive instructions in this regard. The DPO should not have any tasks that could result in conflict of interests. The DPO should not be in charge of carrying out data protection impact assessments, neither should they be in charge of carrying out the BCR-C audits if such situations can result in a conflict of interests. However, the DPO can play a very important and useful role in assisting the BCR members, and the advice of the DPO should be sought for such tasks.

The DPO and their supporting team can be contacted directly, by email at: privacyanddataprotection@mastercard.com, or letter directed to Europe Data Protection Officer, Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium.

4. Business Security Officers and Records Management Champions

The Privacy & Data Protection Team is supported in certain jurisdictions by business security officers. In addition, we have appointed Business Unit Records Management Champions globally, who sit in a variety of business and support functions, and who promote employee awareness about data protection, records retention and these BCRs. The Privacy & Data Protection Team also works closely with multiple teams around the globe, including the Corporate Security Team as well as the Information Incident Response and Records Retention teams, to ensure that our privacy and data protection program and these BCRs are effectively implemented.

5. Training & Awareness

Mastercard BCRs Entities provide appropriate training on the BCRs to Mastercard Staff who have permanent or regular access to Personal Information, who are involved in the Processing of Personal Information or are involved in the development of tools used to Process Personal Information.

Mastercard's Privacy & Data Protection Team provides Mastercard Staff with engaging, relevant and up-to-date training about a variety of privacy and data-related topics, including Mastercard's policies and procedures, these BCRs and Mastercard's procedures for handling conflict of laws as outlined in Section IX Mastercard's privacy training program is designed to provide Mastercard Staff with the knowledge, tools and resources they need to protect Personal Information and is tailored according to role, function, and

access to Personal Information.

All Mastercard Staff are required to take a mandatory data protection course every two years and the completion of the course is audited. Specialized training modules are also provided for Mastercard Staff in specific roles, functions or in specific jurisdictions. We use interactive methods to deliver training including videos, webcast programs, live fora and social activities to stress the importance of data protection and the role of our BCRs to all Mastercard Staff.

6. Control & Audit

Mastercard commits to conduct data protection audits on a regular basis and if there are indications of non-compliance with the BCRs. Specific audits may be requested by the Privacy & Data Protection Team, or any other competent function within Mastercard. Our audit program covers all aspects of the BCRs and specifies the audit method(s) applied and steps that are taken to ensure remediation where necessary.

Mastercard commits to take the following actions to monitor compliance with EU Data Protection Law, including all the requirements of the BCRs, by:

- Carrying out audits for compliance on a regular basis (i.e., annually unless more frequent audits are appropriate in light of the risks to Individuals' rights and freedoms posed by the data processing) internally and/or by appointing external auditors where needed, and upon request. Any external auditors entrusted with supporting or performing such audits will be bound by appropriate contractual terms that delineate the scope of the audit and ensure confidentiality and designated on the basis of their professional qualities, in particular, expert knowledge of data protection law and practices;

- Designating the internal audit team or, where appropriate, another team that functions independently from the Privacy and Data Protection Team, as the department responsible for (i) carrying out selected audits and (ii) establishing the scope of each BCR audit in consultation with the Privacy and Data Protection team, based on a risk-based approach and considering the risks present at the time of the audit;

- Communicating the results of the audit to the internal audit team, the Europe Data Protection Officer, the Privacy & Data Protection Team, the board of Mastercard Europe SA and the Mastercard Group Audit Committee;

- Ensuring that corrective actions take place based on the results of the audit;

- Providing the Belgian SA and other Competent SAs with the result of the audit report upon request and under the strictest confidentiality obligations;

- Allowing the Belgian SA and other Competent SAs to verify compliance of any Mastercard BCRs entity with EU Data Protection Law and the BCRs in accordance with Applicable Law in the EEA, applying the highest confidentiality requirements, and duly taking into account any risks for the security, integrity and confidentiality of Mastercard's payment network and of the global financial system; and

- Cooperating with SAs with regard to any questions relating to the Processing of Personal Information by the Mastercard BCRs Entities.

None of the above confidentiality requirements should restrict the duty of Mastercard BCRs Entities to communicate the results of the audit report to the Belgian SA or other Competent SAs, nor should they limit the Belgian SA's or other Competent SAs ability to issue an enforcement notice, in compliance with Applicable Law in the EEA, where corrective action arising from the audit is ignored.

Where we act as Data Processor and subject to the strictest confidentiality obligations, we allow the Data Controller to request an audit of our data protection compliance program by external independent auditors, which are jointly selected by Mastercard and the Data Controller. The external independent auditor cannot

be a competitor of Mastercard. Mastercard and the Data Controller will mutually agree upon the scope, timing, and duration of the audit. Mastercard will make available to the Data Controller the result of the audit of its data protection compliance program. The Data Controller must reimburse Mastercard for all expenses and costs for such an audit. In addition to the above, if the Data Controller requesting the audit is a competitor of Mastercard, Mastercard will be entitled, in cooperation with the jointly selected external auditor, to redact any commercially sensitive and confidential information from the audit report.

In addition, we bind our external Sub-Processors to: (1) provide Mastercard with the necessary information to help us verify the Sub-Processor's compliance with its data protection obligations; and (2) where necessary allow Mastercard to perform or order an on-site audit of the procedures relevant to the protection of Personal Information on behalf of our customers, acting as Data Controllers.

VI. Liability

1. Responsibility Of Mastercard BCRs Entities

The Mastercard BCRs are enforced by all Mastercard BCRs entities in accordance with an Intra-Group Agreement. Each Mastercard BCRs Entity is responsible for complying with the BCRs and for informing the Data Exporter if it is unable to comply with the BCRs for whatever reason. If a Mastercard BCRs Entity is in breach of the BCRs or otherwise unable to comply with them, Mastercard will take steps to address the issue, including suspending transfers where applicable.

When a Mastercard BCRs Entity, acting as a Data Importer, (i) is in substantial or persistent breach of the BCRs; or (ii) fails to comply with a binding decision of a competent court or Competent SA regarding its obligations under the BCRs, or (iii) the data exporter has suspended the transfer, and compliance with this BCRC is not restored within a reasonable time, and in any event within one month of suspension; it must, at the choice of the Data Exporter, immediately delete or return the Personal Information to the Data Exporter in its entirety. The Data Importer will remain bound by the BCRs until the Personal Information has been deleted or returned to the Data Exporter and demonstrates that all copies of the Personal Information have been deleted. Where local laws prohibit the return or deletion of Personal Information, the Data Importer will continue to comply with the BCRs and only Process the Personal Information to the extent and for as long as required under those local laws. When a Mastercard BCRs Entity ceases to be bound by the BCRs, it may keep, return or delete the Personal Information received under the BCRs. If it keeps that Personal Information, it shall protect the Personal Information in accordance with Chapter V of the GDPR.

In addition to the individual responsibility of Mastercard BCRs Entities, Mastercard Europe SA accepts responsibility and agrees to, at any given time:

- Take the necessary action to remedy breaches of these BCRs caused by other Mastercard BCRs Entities located outside the EEA, and contractual breaches caused by Data Processors or Sub-Processors located outside the EEA.

- Pay compensation for any material or non-material damages incurred as a result of such breaches by a Mastercard BCRs Entity, a Data Processor or a Sub-Processor, unless Mastercard Europe SA can demonstrate that the damage could not be attributed to a Mastercard BCRs Entity, a Data Processor and a Sub-Processor.

Mastercard Europe SA confirms that it has sufficient assets to pay compensation for damages resulting from the breach of the BCRs.

2. Third Party Beneficiary Rights

In situations where Mastercard acts as a Data Controller, Individuals have the right to enforce the BCRs as third-party beneficiaries, including:

- The data protection principles, lawfulness of Processing (Section IV.2), Individual's rights (i.e., the rights of information, access, rectification, erasure, restriction, notification regarding rectification or erasure or restriction, objection to processing, right not to be subject to decisions based solely on

automated processing, including profiling) (Section IV.1, 6 and 7), security and Personal Data Breach notification (Section IV.8), and restrictions on onward transfers (Section IV. 9);

- The right to transparency about (updates to) the BCRs and the list of BCRs members (without undue delay) and easy access to the BCRs (Sections IV.1 and VII),

- The right to complain through the internal complaint mechanism (Section VIII.1);

- The right to lodge a complaint with a SA and to seek judicial remedies and redress and to claim compensation in Courts (Section VIII.2);

- The obligations in case of local laws and practices affecting compliance with the BCRs and in case of government access requests (Section IX);

- The duty to cooperate with Competent SAs relating to compliance obligations covered by this third party beneficiary clause (Section VIII.3);

- This section on liability and jurisdiction.

Therefore, if a Mastercard BCRs Entity violates the BCRs, courts or other judicial authorities and SAs in the EEA will have jurisdiction and Individuals will have the rights and remedies against Mastercard Europe SA as if Mastercard Europe SA had committed the violation in the country in which Individuals are located (instead of the country of the Mastercard BCRs Entity outside the EEA).

When we act as Data Processor on behalf of customers, customers believing that our BCRs are not complied with have the right to enforce the BCRs against any Mastercard BCRs entity for breaches they caused and the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the BCRs caused by internal or external Sub-Processors. Moreover, customers have the right to enforce the BCRs against Mastercard Europe SA for breach of the BCR or of the data processing agreement by internal or external Sub-Processors.

In addition, in situations where Mastercard acts as a Data Processor, Individuals have the right to enforce the BCR as third-party beneficiaries directly against Mastercard where:

- The requirements at stake are specifically directed to Data Processors in accordance with the GDPR, in particular the duty to (i) respect the instructions received from the Data Controller, (ii) implement appropriate technical and organizational security measures, (iii) notify any Personal Data Breach to the Data Controller, (iv) respect the conditions to engage a Sub-Processor, (v) cooperate with and assist the Data Controller in complying and demonstrating compliance with the law, (vi) provide easy access to BCRs, (vii) grant a right to complain through an internal complaint mechanism, (viii) cooperate with the SA; as well as requirements pertaining to (xi) liability, compensation and jurisdiction and (x) conflicts of law.

- They are not able to bring a claim against the Data Controller because the Data Controller has factually disappeared or ceased to exist in law or has become insolvent, unless any successor has assumed the entire legal obligations of the Data Controller by contract of by operation of law, in which case the Individuals can enforce their rights against such entity. In those situations, Individuals have the right to enforce Sections II, IV.1, IV.10, VI, VIII.1, VIII.3 and IX and Appendix 1 of the BCRs against Mastercard Europe SA.

In the above scenarios, Individuals are entitled to:

- Lodge a complaint before the SA of the EU Member State of his or her habitual residence, place of work or place of alleged infringement and take action against Mastercard before the Courts where the Data Controller or Mastercard has an establishment or where the Individual has his or her habitual residence.

- Obtain redress and, where appropriate, compensation to remedy breaches of the BCRs. Where

Mastercard, acting as a Data Controller or a Data Processor, and another third party involved in the same Processing are found responsible for any damage caused by such Processing, Individuals are entitled to receive compensation for the entire damage directly from Mastercard and the other third party involved in the Processing. Individuals may choose to be represented by a not-for-profit body, organization or association which has been properly constituted in accordance with the law of a Member State, has statutory objectives which are in the public interest, and is active in the field of the protection of data subjects' rights and freedoms with regard to the protection of their personal data as set out in Article 80(1) GDPR.

- Obtain a copy of the public version of the BCRs, including its appendixes, and a copy of the Intra-Group Agreement (without any sensitive and confidential commercial information).

3. Burden Of Proof

Where Individuals or customers bring a claim or proceeding for a violation of the Mastercard BCRs and can demonstrate that they have suffered damage and establish facts which show that it is likely that the damage occurred because of a violation of the Mastercard BCRs or contractual breaches caused by Data Processors or Sub-Processors located outside the EEA, Mastercard Europe SA is responsible for proving that the Mastercard BCRs Entity outside the EEA, the external Data Processors and Sub-Processor were not responsible for the violation giving rise to that damage or that no violation occurred. Where Mastercard Europe SA is successful in proving that the Mastercard BCRs Entity outside the EEA, the Data Processor and the Sub-Processor are not responsible for the violation, Mastercard Europe SA may discharge itself from any responsibility.

VII. Updates To The BCRs

We may update our BCRs to reflect, for example, changes in our Personal Information practices, modifications of the regulatory environment or our company structure.

We commit to report changes to our BCRs, including to the list of BCRs members, without undue delay to all Mastercard BCRs Entities and to the SAs, via the Belgian SA as described herein, and where necessary, we will seek a new approval of the BCRs. However, we may update the BCRs, including the list of Mastercard Entities bound by the BCRs, without re-applying for an approval. In addition to the above, where a change affects the processing conditions, we'll inform the Data Controller in a timely fashion so as to allow the Data Controller the opportunity to object to the change or to terminate the contract before the modification is made.

VIII. How Can You Lodge A Complaint And Enforce The BCRs?

1. Internal Complaint Handling

We have implemented internal policies, processes and procedures to allow Individuals to exercise their rights and to manage complaints regarding our Personal Information practices, and these are overseen by the Privacy & Data Protection Team, Mastercard's top management and the Europe Data Protection Officer.

In situations where Mastercard acts as a Data Controller:

- If an Individual or a customer has reasons to believe that a Mastercard BCRs Entity has not complied with the BCRs, they can lodge a complaint with the SA or the courts of their country of residence or directly with Mastercard.

- To lodge a complaint with Mastercard, Individuals can proceed in the following ways:

    - E-mail us at: Privacyanddataprotection@mastercard.com by including the term "BCRs" in the subject line; or

- Write to us at: Privacy & Data Protection Team, Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium.

- All complaints are handled by our Privacy & Data Protection Team, assisted by the Europe Data Protection Officer, as follows:
  - We review the complaint and send an acknowledgement of receipt within ten (10) working days.
  - We then investigate the complaint and respond to it as soon as possible and within one month of receipt.
  - If the complaint is particularly complex, or given the number of complaints, Mastercard will provide an estimate of when the response will be provided to the complainant and in any event the response will be provided within three months of the receipt and will explain why it needs extra-time.

- If the complaint is upheld, Mastercard BCRs Entities take appropriate remedial measures as necessary to resolve the complaint and ensure compliance with the BCRs as appropriate.

- If an Individual is not satisfied with the response from the Privacy & Data Protection Team (including in case of unjustified delays), that Individual can lodge a complaint with the Competent SA or lodge a claim with a court of competent jurisdiction, preferably the Belgian SA or the courts of Belgium. The Individual's right to lodge a complaint before the Competent SA or lodge a claim with a court of a competent jurisdiction is not dependent on the Individual having used the above complaint handling process beforehand.

Where we act as Data Processor, we strongly encourage Individuals to first seek to contact the relevant Data Controller. If we receive a complaint directly from an Individual, our Privacy & Data Protection Team will review the complaint and will forward it to the relevant Data Controller, unless the Data Controller has ceased to exist or became insolvent in which case the complaint is handled by Mastercard as described above.

2. Redress and Compensation for Individuals

In addition to the internal complaint described above, Individuals can seek redress by: (1) lodging a complaint with a SA; and (2) seeking a judicial remedy or claiming compensation in court. Individuals are free to lodge a complaint with a SA, seek a judicial remedy or claim compensation in court regardless of whether they have first lodged a complaint with Mastercard.

To ensure the best possible cooperation and efficiency in relation to complaints, it is preferable that Individuals exercise their rights before the Belgian SA or the courts of Belgium. However, this does not preclude them from their right to enforce the BCRs before the SA or the courts of the Individual's country of residence.

When we act as Data Processor on behalf of customers, customers who believe that our BCRs are not complied with have the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the BCRs caused by internal or external Sub-Processors.

3. Duty of Cooperation

Mastercard BCRs Entities will cooperate with requests, queries or complaints from Individuals, Data Controllers and Supervisory Authorities. Mastercard BCRs Entities will accept to be audited, cooperate with inspections (where necessary on-site) by, and follow the recommendations and decisions of, the Belgian SA and other Competent SAs regarding the implementation of the BCRs, including by providing information, upon request by Competent SAs, about its Processing operations covered by the BCRs. Any dispute with a Competent SA arising from its supervision of compliance with the BCRs will be resolved by the courts of the Member State of the concerned SA in accordance with that Member State's procedural law. Mastercard BCRs Entities will submit to the jurisdiction of these courts.

IX. Obligations In Case Of Local Laws And Practices Affecting Compliance With The BCRs And Government Access Requests

1. Local Law And Practices Assessments

The BCRs Entities transfer Personal Information based on these BCRs when they have determined that the local laws and practices of the destination country (as applicable to the Data Importer) do not prevent them from fulfilling their obligations under the BCRs. When performing their assessment, the BCRs Entities take due account of the following elements:

- The specific circumstances of the transfers and of any envisaged onward transfers within the same third country or to another third country, including the (i) purposes for which the data are transferred and processed (e.g., marketing, HR, storage, IT support, clinical trials); (ii) types of entities involved in the processing (the data importer and any further recipient of any onward transfer); (iii) economic sector in which the transfer or set of transfers occur; (iv) categories and format of the personal data transferred; (v) location of the processing, including storage; and (vi) transmission channels used;

- The laws and practices of the destination country relevant to the transfer, including those requiring disclosure of Personal Information to public authorities or authorizing access by such authorities and those providing for access to these data during the transit between the country of the data exporter and the country of the data importer, as well as the applicable limitations and safeguards;

- Any supplementing contractual, technical or organizational safeguards, including measures applied during the transmission and to Processing of the Personal Information in the country of destination.

The Data Exporter will monitor developments on an ongoing basis, where appropriate in collaboration with its Data Importer(s), that could affect the initial assessment of the level of protection and the decisions taken.

Where a Mastercard BCRs Entity, acting as a Data Importer, has reasons to believe that local law or practices are likely to prevent it from fulfilling its obligations under these BCRs, it will promptly notify the BCRs Entity (acting as the Data Exporter). The matter is also referred to the Privacy & Data Protection Team (which also informs Mastercard Europe SA) for resolution, and as required under Applicable Law in the EEA, to the Belgian SA.

Our Privacy & Data Protection Team along with Mastercard Europe SA reviews each matter on a case-by-case basis and, where necessary, assists the BCRs Entities in identifying supplementary measures to enable them to fulfil their obligations under the BCRs. Where appropriate, the identified supplementary measures will be applied for the same type of transfers performed by other BCRs Entities. The same applies if a BCR Entity acting as Data Exporter has reasons to believe that a BCR Entity acting as its Data Importer can no longer fulfil its obligations under this BCRs. These assessments are documented internally and made available to the Competent SAs upon request.

Where the Data Exporter, along with Mastercard Europe SA and the Privacy & Data Protection Team, determines that the BCRs cannot be complied with or if instructed by the Competent SAs, the relevant transfers, as well as all transfers for which the same assessment and reasoning would lead to a similar result, will be suspended until compliance is again ensured. If compliance is not restored within one month, the transfer will be ended. Personal Information transferred prior to the suspension, and any copies thereof, should, at the choice of the Data Exporter, be returned to it or destroyed in their entirety.

2. Local Laws And Practices Affecting Compliance With The BCRs and Government Access Requests

If a BCRs Entity acting as Data Importer becomes aware of any direct access to Personal Information or receives a legally binding access request for Personal Information ("request") by a law enforcement authority or state security body ("requesting authority"), the matter is referred to the central Law Enforcement Support team within Mastercard, which will promptly inform the relevant Mastercard entity acting as Data Exporter as appropriate and, where possible, the Individual. Depending on the circumstances, such notification will include information about the Personal Information requested, the requesting authority, the legal basis for the request and the response provided or all information available to the BCRs Entity acting as Data

Importer. Where there are reasons to believe that the request is likely to prevent a Mastercard BCRs Entity from fulfilling its obligations under the BCRs, the Privacy & Data Protection Team is consulted.

Mastercard responds to the request by informing the requesting authority about our limited data set. We also refer the requesting authority to the appropriate financial institution, which holds more comprehensive information about the relevant cardholder. Where the requesting authority pursues the request, we ensure that it follows the legal requirements in its country and jurisdiction, including any applicable privacy safeguards, and whether it remains within the powers granted to the requesting authority. If a careful assessment concludes that there are reasonable grounds to question the legitimacy or scope of the request (where there are reasonable grounds to consider that the request is unlawful under the laws of the country of destination, applicable obligations under international law, and principles of international comity), Mastercard will challenge it and under the same conditions, pursue possibilities of appeal.

Mastercard will seek interim measures to suspend the effects of the request until the competent judicial authority has decided on its merits and will not disclose the Personal Information until required to do so under the applicable procedural rules. We document the aforementioned legal assessment, as well as the supplementary measures selected and implemented, and any challenge to the request, to the extent permissible under the laws of the country of destination, and make the documentation available to the concerned Mastercard BCRs Entity and the Competent SA, upon request. Only when we are satisfied that the legal process is valid and appropriate, and when we are convinced that the request does not prevent a Mastercard BCRs Entity from fulfilling its obligations under these BCRs and does not have a substantial effect on the guarantees provided by them, do we deliver the narrowest possible set of data required to be responsive to the request while ensuring data minimization.

If we do not manage to resolve the conflict of laws, the Privacy & Data Protection Team will use its best efforts to put the access request on hold for a reasonable delay in order to consult with the Belgian SA on how to resolve it, unless otherwise prohibited by Applicable Law in the country of the concerned Mastercard BCRs Entity, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation.

Mandatory requirements of local law, that respect the essence of the fundamental rights and freedoms, applicable to a Mastercard BCRs Entity, which are not massive, disproportionate and indiscriminate in a manner that would go beyond what is necessary in a democratic society on the basis of one of the interests listed in Article 23 (1) of the GDPR, are in principle not in contradiction with the BCRs and thus do not require consultation with the Belgian SA. However, in case of doubt, Mastercard will consult with the Belgian SA.

When the suspension and/or notification of such requests to the Data Exporter and/or Individuals are prohibited, such as in case of a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation, Mastercard will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible to the Data Exporter, and be able to demonstrate that it did so. If despite having used its best efforts, Mastercard is not in a position to inform the Data Exporter of the aforementioned information, it will inform the Data Exporter thereof.

The Data importer will provide the Data Exporter, at regular intervals, with as much relevant information as possible on the requests received (in particular, number of requests, type of data requested, requesting authority or authorities, whether requests have been challenged and the outcome of such challenges, etc.). If the Data Importer is or becomes partially or completely prohibited from providing the Data Exporter with the aforementioned information, it will, without undue delay, inform the Data Exporter accordingly. The Data Importer will preserve relevant information on the requests (e.g., number of applications for disclosure, type of Personal Information requested, requesting authority if possible) for as long as the Personal Information is subject to the safeguards provided by the BCRs and make it available to the Competent SA upon request or whenever needed.

In addition to the above, where a Mastercard BCRs Entity acts as Data Processor, we notify the Data Controller when local laws prevent the Mastercard BCRs Entity (1) from fulfilling its obligations under these BCRs and have a substantial adverse effect on the guarantees provided by these BCR, and (2) from complying with the instructions received from the Data Controller via the Mastercard Rules or the data

processing agreement between Mastercard and the Data Controller. We do not notify Data Controllers if such disclosure is prohibited by Applicable Law in the country of the concerned Mastercard BCRs Entity, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation. The Data Controller is responsible for notifying its Competent Supervisory Authority if applicable and as authorized under Applicable Law in the country of the concerned Mastercard BCRs Entity.

Appendix 1 Mastercard Entities Covered By The BCRs

Mastercard BCRs Entities and Mastercard Staff are bound to respect the BCRs. At a high-level, Mastercard BCRs Entities are structured as follows:

- Mastercard Europe SA, Waterloo, Belgium is the European headquarters of Mastercard.
- Mastercard International Incorporated is the global headquarters of Mastercard.
- All other entities are subsidiaries or affiliates of Mastercard Europe SA, Waterloo, Belgium or Mastercard International Incorporated.

The following Mastercard BCRs Entities have signed Mastercard's Intra-group Agreement:

The following list is accurate as of July 2025. For a fully updated list of entities please contact the Privacy & Data Protection Team at Privacyanddataprotection@mastercard.com.

FOR EUROPE:			
Country	**Mastercard BCRs Entity**	**Registration number**	**Contact Details**
Armenia	Armenia Representative Office of Mastercard Europe S.A.		51 Komitas ave, 51/4, Arabkir district, Yerevan, Armenia 0014, Armenia
Austria	Austria Representative Office of Mastercard Europe SA	300398440/ UID ATU642 17378	Wipplingerstraße 30/DG, Vienna 1010, Austria
	IfOnly Austria GmbH	FN 50 1126	Küniglberggasse 7, Vienna 1130, Austria
Azerbaijan	Azerbaijan Representative Office of Mastercard Europe SA , Azerbaijan	1403433041	AZ10784/189 Falez Plaza 6th Floor, Nasimi District Hasan Aliyev, Baku City, Azerbaijan AZ1078
Belarus	Belarus Representative Office of Mastercard Europe SA	102397251	4-32 Zybitskaya Str., 2nd (second) floor No: 32-1, Minsk, 220030, Belarus
Belgium	Mastercard Europe S.A.	0448.038.446	Chaussée de Tervuren 198A B- 1410, Waterloo, Belgium
	Belgium Branch (Waterloo) of Maestro International Incorporated	0463.192.915	Chaussee de Tervuren 198A, Waterloo, 1410, Belgium
	Mastercard Jupiter Investments SPRL	0830.805.493	Chaussee de Tervuren 198A, Waterloo, Belgium 1410, Belgium
	Mastercard Transaction Services (Europe) SA	0549987921	Chaussée de Tervuren 198A, Waterloo 1410, Belgium

Bosnia & Herzegovina	Bosnia and Herzegovina Representative Office of Mastercard Europe SA	4202169990006	-UNITIC Business Centre, Fra Andela Zvizdovica 1, Sarajevo71000, Bosnia and Herzegovina
Bulgaria	Bulgaria Rep. Office of Mastercard Europe SA	176381804	-88 Kniaz Aleksandar Dondukov Blvd, fl. 4, Oborishte Region,Sofia, Bulgaria 1527, Bulgaria
Bulgaria	Sel Int Ltd Bulgaria EOOD	200217365	37A Fridtjof Nansen str, 5th floor, Sredets Region, Sofia 1142, Bulgaria
Croatia	Croatia Branch of Mastercard Europe SA	080867029	Radnička cesta 80/12, Zagreb Tower, Zagreb 10000, Croatia (Local Name: Hrvatska)
Cyprus	Cyprus Rep office of Mastercard Europe SA	AE3516	Hadjikyriakeion Bld 1, 121 Prodromou Avenue, 1st floor, Nicosia 2064, Cyprus
Czech Republic	Czech Republic Branch of Mastercard Europe SA	693 45 724	Palladium, Na Porici 1079/3a, 110 00 Prague 1, Czech Republic
	Session M Czech Republic s.r.o.	077 21 587	Pernerova 697/35, Karlin, 186 00 Prague 8, Czech Republic
Denmark	Denmark Branch of Mastercard Europe SA	37501727	Arne Jacobsens Allé 13, København S, Copenhagen, Denmark
	Mastercard Payment Services Denmark A/S	40695869	Arne Jacobsens Alle 13, Copenhagen S 2300, Denmark
	Aiia A/S	35509006	Artillerivej 86, ST. TV., 2300 Copenhagen, Denmark
Finland	Finland Branch of Mastercard Europe SA	2751634-9	Etelaesplanadi 2, 3C/4D Krs. Helsinki, 00130 Finland
France	Mastercard France SAS, France	501573158	112, Avenue Kleber 75784 Paris Cedex 16 France
	France Branch of HomeSend SPRL	821 562 360	31 Chemin du Vieux Chene, Meylan 38240, France
	France Branch of Mastercard Transaction Services Europe SA	821562360	Montbonnot Valley, 26 Avenue Jean Kuntzmann, Montbonnot-Saint-Martin, 38330, France
Georgia	Georgia Representative Office of Mastercard Europe SA	404552649	737M Ilia Chavchavadze Avenue, Floor 5, Tbilisi, Georgia,
Germany	Germany Representative	006 412 000	Taunusanlage 9-10,

	Office of Mastercard Europe SA		Frankfurt/-am Main 60329, Germany
	Dynamic Yield GmbH	HRB 115651	c/o MAZARS Tax GmbH, Theodor-Stern-Kai 1, Frankfurt am Main 60596, Germany
Greece	Mastercard Europe Greece Single Member S.A.	156214201000	Vasilissis Sofias Avenue No 23, Athens, 10674, Greece
Hungary	Hungary Representative Office of Mastercard Europe SA	01-12-073361	Paulay Ede utca 55, Budapest, Hungary 1061, Hungary
	Mastercard Magyarország Korlátolt Felelősségű Társaság	01-09-383338	Deak Ferenc ucta 5, Budapest 1052, Hungary
	Ekata Global Hungary Kft	01-09-171264	1092 Budapest, Köztelek utca 6. 3. em., Hungary
Ireland	Ethoca Limited	412289	Mountain View, Central Park, Dublin 18, Ireland
	Ethoca Nominees Limited	557283	Mountain View, Central Park, Dublin 18, Ireland
	Mastercard Ireland Limited, Ireland	499963	One South County, South County Business Park, Dublin 18, Ireland
	Truata (Management) Limited	627068	Whelan House, South County Business Park, Leopardstown, Dublin, Ireland D18 T9P8, Ireland
	Truata Holdings Limited	622419	Whelan House, South County Business Park, Leopardstown, Dublin, Ireland D18 T9P8, Ireland
	Truata Limited	622418	Whelan House, South County Business Park, Leopardstown, Dublin, Ireland D18 T9P8, Ireland
Israel	Mastercard Israel Subsidiary Ltd.	515837888	Aluf Kalman Magen 3, Tel Aviv, 6107075 Israel
	Finsec Lab Ltd.	516105624	Aluf Kalman Magen St. 3, Tel Aviv-Yafo 6107075, Israel
	Dynamic Yield Ltd.	51-474336-8	114 Alon Yigal street, Tel Aviv - Jaffa, Israel 6744320, Israel
Italy	Italy Branch of Mastercard Europe SA	97091560587	–Via Turati, 30, Milan, Italy 20121, Italy
Kazakhstan	Kazakhstan Representative Office of Mastercard Europe SA	120542010604	-n.p.8a, 77/7 Al-Farabi Avenue, 050040 (A15E3H4), Almaty,050040 Kazakhstan
Latvia	SIA Dynamic Yield	40203360276	Duntes iela 6, Rīga LV-

			1013, Latvia
Lebanon	Mastercard Lebanon Representative Office	2975	Beirut Souks 1479/Al Marfa'a, Bloc M 4th Floor, Beirut, Lebanon
Macedonia, The Former Yugoslav	Mastercard Europe Kingdom of Belgium – Representative office in Republic of North Macedonia Skopje	7652186	Filip Vtori Makedonski N 5, the North Macedonia, Skopje 1000, Macedonia, The Former Yugoslav
Moldova	Mastercard Europe SA Waterloo Sucursala Chisinau	1022600054060	Alexandru cel Bun str, 49, Chisinau, Moldova MD-2012, Moldova, Republic Of
Netherlands	Netherlands Branch of Mastercard Europe SA-	50304348	Prins Hendrikkade 48, Amsterdam, Netherlands 1012AC, Netherlands
	Trans-Fast International Cooperatief, UA	59274034	De Lairessestraat 145 A, Amsterdam, Netherlands 1075HJ, Netherlands
	Ekata Global - Netherlands B.V.	74096397	Prins Hendrikkade 48, 1012AC Amsterdam, The Netherlands
Norway	Norway Branch of Mastercard Europe SA	816 220 122	Regus Posthuset, Biskop Gunnerus gate 14a, Oslo 0185, Norway
	Mastercard Payment Services Infrastructure (Norway) AS	922988862	Haavard Martinsens vei 51, Oslo 0978, Norway
	Mastercard Payment Services Norway AS	822988822	Haavard Martinsens vei 51, Oslo 0978, Norway
Poland	Poland Branch of Mastercard Europe SA	0000345959	Warsaw Spire, 30th Floor, Plac Europejski 1 Warsaw 00-844, Poland
	Mastercard S.A.	0000316035	Dominikanska, 02-738, Warsaw, Poland
Portugal	Portugal Representative Office of Mastercard Europe SA	980276500	Portugal Praça Marquês de Pombal, nº 14, Lisbon, Portugal 1250 162, Portugal
	Mastercard Portugal, Unipessoal Lda	516889842	Principal Place of Business: Praça Marquês de Pombal, nº 14, Lisbon, Portugal 1250 162 Registered Agent: Avenida
Romania	Mastercard Europe SA Waterloo Sucursala Bucuresti	38645357	4-8 Nicolae Titulescu Street America House Building, West Wing, 2nd Floor, 011141 Bucharest, Romania
Russia	Russia Representative Office of Mastercard Europe SA	NAN2015001113 4 TIN	10 Bolshaya Dmitrovka Street, Building 4, Moscow, Russian Federation, Russian

			Federation
	Mastercard OOO~~,~~	1107746323926	10 Bolshaya Dmitrovka St., Building 4, Moscow, Russia, Russian Federation
Serbia	Mastercard Europe S.A., Serbia Representative Office~~,~~	29026866	Milutina Milankovića 1ž, Entrance B, 5th floor, Belgrade~~,~~ 11070, Serbia
Slovenia	Mastercard Europe S.A., Slovenia Branch	7203543000	Dimičeva ulica 013, Ljubljana 1000, Slovenia
Slovak Republic	Slovak Republic Branch Office of Mastercard Europe SA	54864658	Mlynske Nivy 5, Bratislava-Ruzinov 821 09, Slovakia (Slovak Republic)
Spain	Spain Branch of Mastercard Europe SA	W0171837H	Paseo de la Castellana, 259 C, 11ª Torre Cristal / 28046 Madrid, Spain
	Mastercard Spain Holdings, Sociedad Limitada	M569558 Book 31651/90	Avenida de Concha Espina 39B, Madrid 28016, Spain
Sweden	Mastercard Sweden Services AB	559089	Kungsgatan 33, 4th Floor SE- 111 56 Stockholm, Sweden
	Baffin Bay Networks AB	559035-6183	Kungsgatan 33, 4tr, 111 56, Stockholm Sweden
Switzerland	Switzerland Branch of Mastercard Europe SA	CHE-110.335.313	Löwenstrasse 25 8001 Zürich
Turkey	Turkey Representative Office of Mastercard Europe SA	3810044245	Tamburi Ali Efendi Sok., No: 1334337 Etiler – Istanbul
Ukraine	Ukraine Representative Office of Mastercard Europe SA	26600463	17/52 Bogdana Khmelnitskogo street, floor 4 A, office 404 A, Kiev,-01030, Ukraine
UK	Mastercard Prepaid Management Services Limited~~,~~	05429739	Access House, Cygnet Road Hampton, Peterborough, PE7 8FJ, United Kingdom
	Mastercard Payment Gateway Services Limited, UK	03430157	10 Upper Bank Street London, E14 5NP United Kingdom
	Mastercard Payment Gateway Services Group Limited	03168091	19th Floor, 10 Upper Bank Street, London, E14 5NP, United Kingdom
	Mastercard UK Management Services Ltd, UK	4617367	7th Floor, 1 Angel Lane, London EC4R 3AB, United Kingdom
	Vocalink Holdings Limited	06119036	1, Angel Lane, 9th Floor, London EC4R 3AB, United Kingdom
	Vocalink Limited	06119048	1 Angel Lane, London, EC4R 3AB, United

			Kingdom
	Vocalink International Limited	11646063	1, Angel Lane, 9th Floor, LONDON, United Kingdom
	Voca Ltd	01023742	Drake House, Three Rivers Court, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
	Voca Pension Trustees Ltd	09655475	Drake House, Three Rivers Court, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX,
	Vocalink Interchange Network Ltd	03565766	1, Angel Lane, 9th Floor, LONDON, United Kingdom EC4R 3AB, United
	VocaLink Retail Services Ltd	02094831	Drake House, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
	Mastercard OB Services UK Limited	12507991	1 Angel Lane, London, EC4R 3AB, United Kingdom
	Mastercard Transaction Services (UK) Ltd.	07031967	1 Angel Lane, London, England, EC4R 3AB
	CATSEC 401 Ltd	02999731	1 Angel Lane, London, United Kingdom EC4R 3AB, United Kingdom
	CEL Int, Ltd UK	06678417	Studio 116, Grand Union Studios, 332 Ladbroke Grove, London, United Kingdom,
	Ethoca Dynamic Yield UK Limited	9099120	Highlands House Basingstoke Road, Spencers Wood, Berkshire, Reading, England RG7 1NT, United Kingdom
	Global Mastercard Holdings LP	LP16352	10 Upper Bank Street, London, El4 5NP, England United Kingdom
	IPco 2012 Ltd	08330583	1, Angel Lane, London, United Kingdom EC4R 3AB, United Kingdom
	Mastercard Europe Services Limited	09210818	10 Upper Bank Street, Canary Wharf, London, England E14 5NP, England
	Mastercard Holdings LP	LP16341	10 Upper Bank Street, Canary Wharf, London England

	Mastercard UK Holdco Limited	10255459	1 Angel Lane, London, United Kingdom EC4R 3AB, United Kingdom
	Mastercard/Europay U.K. Limited	2398979	7th Floor, 1 Angel Lane, London, EC4R 3AB, United Kingdom
	Traina Interactive LTD	11033652	7 Albemarle Street, London W1S 4HQ, United Kingdom
	Truata (UK) Limited	13111385	Regency House, 45-53 Chorley New Road, Bolton, United Kingdom BL1 4QR, United Kingdom
FOR NORTH AMERICA:			
Country	**Mastercard BCRs Entity**	**Registration number**	**Contact Details**
Canada	Mastercard Technologies Canada ULC	1146475	475 Howe Street, Vancouver, British Columbia V63 2B3, Canada
	Ethoca LLC	4723423	4211 Yonge Street, Suite 202, Toronto, Ontario M2P 2A9, Canada
	Ethoca Technologies Inc.	2087762	100 Sheppard Ave. East, Suite 605, Toronto, ON M2N 6N5, Canada
	Mastercard Canada ULC	823401195BC0001	Georgia PO Box 49290, 1000 – 595 Street, British Columbia BC V7X 1S8, Canada
	MC MAPLE ACQUISITION ULC	BC1199328	PO Box 49290, 1000-595 Burrard Street, Vancouver, British Columbia V7X IS8,
	Mastercard Transaction Services (Canada) Inc.	1688924	121 Bloor——Street, Toronto, Ontario M3J1L6, M4W 3M5, Canada
	Mastercard Vocalink Canada Limited	BC1321670	PO Box 49290, 1000 - 595 Burrard Street, Vancouver, British Columbia V7X 1S8, Canada
	-Mastercard Canada Open Finance Solutions ULC	BC1379514	-2600 - 1066 West Hastings Street, Vancouver, British Columbia V6E 3X1, Canada
United States	Mastercard International Incorporated	648928	2000 Purchase Street Purchase,—New York 10577-2509, United

			States
	Mastercard Technologies, LLC	3457984	2200 MasterCard Boulevard 63368-7263 O'Fallon, Mo U.S.A
	Mastercard International Services, Inc.	3454605	2000 Purchase Street, Purchase New York 10577
	Maestro International Incorporated	2364231	2000 Purchase Street, Purchase, New York, 10577-2509, United States
	Mastercard Advisors, LLC	3736123	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC Europe	4332162	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC APMEA	4332163	2000 Purchase Street, Purchase, New York 10577, United States
	Orbiscom Inc.	3162153	2000 Purchase Street, Purchase, Harrison, NY 10577-2509 United States
	Mastercard Mobile Transactions Solution, Inc.	59760807	2000 Purchase Street, Purchase New York 10577-2509, United States
	Mastercard Travelers Cheque, Inc.	2197420	2000 Purchase Street, Purchase New York 10577
	Applied Predictive Technologies, Inc.	3146225	4250 N Fairfax Drive; 11th Floor; Arlington, Virginia 22203, United States
	APT Software Holdings, Inc.	4202357	4250 North Fairfax Drive, 11th Floor, Arlington, Virginia, 22203, U.S.A.
	Brighterion, Inc.	3176106	123 Mission Street, Suite 1700, San Francisco, California 94105 United States
	Ekata Inc.	3999312	1301 5th Avenue, #1600, Seattle, Washington 98101, United States
	Eurocard U.S.A., Inc.	0100052091	9 East 46th Street, New York, New York 10017, United States
	Finicity Corporation	4188418	434 West Ascension Way, Suite 200, Salt Lake City, Utah 84123, United States
	Humanity Ventures LLC	6609893	2000 Purchase Street, Purchase, New York 10577, United States

	IfOnly MX Holding LLC	6567043	150 Green St., 3rd Floor, San Francisco, California 94111, United States
	Mastercard A&M Investment Holdings, LLC	5446149	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Africa, Inc.	3229450	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Center for Inclusive Growth, Inc.	5483520	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Colombia Holdings, LLC	5480411	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Investments, LLC	5480412	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Processing, LLC	5480414	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Technologies, LLC	5480415	2000 Purchase Street, Purchase, New York 10577- 2509, United States
	Mastercard Colombia, Inc.	2477931	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Ecuador, Inc.	4565125	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard EMEA, Inc.	2503294	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Financing Solutions LLC	3692050	2000 Purchase Street, Purchase, New York, 10577-2509, United States
	Mastercard Incorporated	3390142	2000 Purchase Street, County: Westchester, Purchase, New York 10577-2509, United States
	Mastercard International Philippines, Inc.	2753003	1209 Orange Street, Wilmington, DE 19801
	Mastercard Investment Holdings, Inc.	5005370	2000 Purchase Street, Purchase, New York 10577-2509, United States

	Mastercard Latin America Holdings, Inc.	4888456	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Mercosur, Inc.	2633468	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Middle East, Inc	3546843	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Partners LLC	5635607	2000 Purchase Street, Legal Department, Purchase, New York 10577-2509, United
	Mastercard Peru, Inc	3157575	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Prepaid Management Services USA, Inc.	4933598	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Puerto Rico, LLC	192-LLC	-350 Ave Carlos E. Chardon, Suite 225, San Juan, Puerto Rico 00918, United States
	Mastercard UK, Inc.	3245417	10 Upper Bank Street, London, E14 5NP, United Kingdom
	Mastercard US Holdings LLC	5619847	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Venezuela, Inc.	2451848	801 Brickell Avenue, Suite 1300, Miami, Florida 33131, United States
	MTS Holdings, Inc.	2468513	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Purchase Street Holdings, LLC	6985806	2000 Purchase Street, Purchase, New York 10577, United States
	Purchase Street Insurance Services, LLC	4889544	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Purchase Street Reinsurance, Inc.	V750630	400 Cornerstone Drive, Sute 240, Chittenden County, Williston, Vermont 05495,
	RiskRecon, Inc.	5807551	5241 South State Street, Unit 3, Salt Lake City, UT 84107

	Session M, Inc.	4861126	225 Franklin Street, 9th Floor, Boston, Massachusetts 02210
	Mastercard Transaction Services Corp.	7319857	Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware
	Traina Interactive Corp.	5043837	123 Mission Suite 1700, San Francisco, California 94105, United States
	Trans-Fast Remittance Holding, LLC	5428620	Corporation Trust Company, 1209 Orange Street, Suite 400, New York, NY 10005
	Mastercard Transaction Services (US) LLC	4238893	150 Fifth Avenue, New York, New
	Mastercard Transaction Services (California)	3655952	44 Wall Street, 150 Fifth Avenue, New York 10011 United States
	Mastercard Transaction Services (Nevada) Inc.	E0401882016-1	150 Fifth Avenue, New York, New York 10011, United States
	Arcus Financial Intelligence, Inc.	5126491	214 W. 29th St., New York, New York 10001, United States
	Ciphertrace, Inc.	5817112	140 Victory Lane, Los Gatos, California 95030, United States
	Truata LLC	5847238	c/o MASTERCARD INTERNATIONAL INCORPORATED, ATTENTION: CORPORATE SECRETARY, 2000 PURCHASE STREET, PURCHASE, NY, 10577, USA
FOR ASIA PACIFIC:			
Country	**Mastercard BCRs Entity**	**Registration number**	**Contact Details**
Australia	Mastercard Loyalty Solutions Australia Pty Ltd	002693656	72 Christie Street, St Leonards NSW 2065, Australia
	APT Australia Pty. Ltd.	603177171	72 Christie Street, St Leonards, NSW 2065, Australia
	Burst Acquisition Co. Pty. Ltd.	ACN 644 142 834	72 Christie Street, St Leonards, NSW 2065, Australia
	Ethoca Australia Branch	ABN: 891 864	100 Harbour Esplanade Docklands, Victoria

		66976	3008, Australia
	IfOnly Australia Pty Ltd.	629 248 399	Suite 204, 477 Collins Street, Melbourne, Victoria VIC 3000, Australia
	Mastercard Asia/Pacific (Australia) Pty Ltd	108 603 345	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Holding Pty Ltd	143 337 722	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Pty Ltd	168 732 429	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Prepaid Management Services Australia Pty Ltd	145 452 044	72 Christie Street, St. Leonards, NSW 2065, Australia
	Mastercard Travel Solutions Australia Pty Ltd	003 745 999	72 Christie Street, St Leonards, NSW 2065, Australia
	Plus Points Pty Ltd	101 890 537	72 Christie Street, St Leonards, NSW 2065, Australia
	PPS Loyalty Pty Ltd	129 013 921	72 Christie Street, St Leonards, NSW 2065, Australia
	Trans-Fast Pty, Ltd	95149710494	53B Sunnybank Hills Shopping Town, Sunnybank Hills, Australia QLD 4109, Australia-
	Wameja Pty Ltd	052 947 743	72 Christie Street, St Leonards, NSW 2065, Australia
Bangladesh	Bangladesh, Liaison office of Mastercard Transaction Services (US) LLC	03.219.344.00.00.0000.2530.02092019	City Centre, Level-27, Suite # 26 A1-A2, 90/1, Motijheel, C/A, GPO, Dhaka, PO: 1000
	Bangladesh Representative Office of Mastercard Singapore Holding Pte. Ltd.	03.219.344.00.00.0000.2478.24072019	Crystal Place (12th Floor), SE (D) 22, Road #140, Gulshan South Avenue, Gulshan- 1, Dhaka 1212,
Cambodia	Cambodia Representative Office of Mastercard Singapore Holding Pte. Ltd.	1784/2015	Canadia 18th Floors, No. 315, Aung Doung Street Corner Monivong Blvd, Sangkat Wat Phnom, Khan Daun Penh,
China	APT Technology Consulting (Shanghai) Co., Ltd.	91310115MA13LDL5Q	Unit 1904, No. 8 Central Avenue, Pilot Free Trade Zone, Shanghai, China

	Beijing Branch of Mastercard Information Technology (Shanghai) Co., Ltd	110000450260468	B1207, NO.26, Chaowai Street, Chaoyang District, Beijing, China
	China Branch (Beijing) of Mastercard Shanghai Business Consulting Co., Ltd.	1100004501658 14	Room 501A, 5th Floor, China Resources Building, No. 8 Jianguomenbei Avenue, Dongcheng District, Beijing 10005, China
	China Branch (Guangzhou) of Mastercard Shanghai Business Consulting Co. Ltd.	440101400068925	Room 2015-16A, CITIC Plaza, No. 233 Tianhe North Road, Guangzhou, 510613, China
	China Representative Office (Beijing) of Mastercard International Incorporated	91110000X00004579	No. 8 Janguomen Wei Ave., China Resources Building, Room 701-702, Beijing, 100005, China
	China Representative Office (Guangzhou) of Mastercard International Incorporated	914401017812109 58N	Room 2015-16A, CITIC Plaza, No. 233 Tian He North Road, Guangzhou, Guangzhou
	Mastercard Information Technology (Shanghai) Co., Ltd.	[2010]0192	No. 68 Middle Yin Cheng Road, Suite 04, Floor 40, One Lujiazui, Pudong New District, Shanghai, China, China
	Mastercard Netsunion Information Technology (Beijing) Co, Ltd.	91110102MA01HHL193	Room 111, No. 101 Building 3, Beishanhuan Middle Road No. 29, Xicheng District, Beijing, China
	Mastercard Shanghai Business Consulting Ltd.	310000400564516	Room 2907-14, 29/F, Shanghai IFC, 8 Century Avenue, Pudong, Shanghai, China 200120, China
	Pudong Branch of Mastercard Information Technology (Shanghai) Co.,	310115500130618	Room 04, 40/F, One Lujiazui | No.68, Middle Yincheng Road, Shanghai,-China
Hong Kong	Mastercard Asia/Pacific (Hong Kong) Limited	34668852	Suite 1801-03, 18/F Central Plaza, 18 Harbour Road, Wanchai, Hong Kong (Registered Office)
	Mastercard Loyalty Solutions China Limited	50677275	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong, Hong Kong
	Mastercard Loyalty Solutions Hong Kong Limited	31708219	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong,

			Hong Kong
	Mastercard Loyalty Solutions International Limited	30784268	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong, Hong Kong
	Mastercard Travel Solutions Hong Kong Limited	58059586	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong, Hong Kong
	New York Bay (Hong Kong) Ltd	64514596	Unit 5805, 58/F, Two International Finance Centre, 8 Finance Street, Central Hong Kong, Hong Kong, Hong Kong, Hong Kong
India	Mastercard India Services Private Limited	U93000HR2012FTC047951	4th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon – 122 002, India
	Mastercard Technology Private Limited, India	U72200PN2000PTC014585	Business Bay, 10th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club Golf Course Airport Road, Yerwada, Pune – 411006, India
	Mastercard Mobile Transactions Solutions Private Limited	U72200PN2005PTC165613	Business Bay, 4th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club Golf Course Airport Road, Yerwada, Pune – 411006, India
	Mastercard Loyalty Solutions India Private Limited	U74900MH209PTC190903	602-603, Windfall, Sahar Plaza, J B Nagar, Andheri- Kurla Road Mumbai, Maharashtra, 400 059 India
	India Branch (Gurgaon) of MasterCard Advisors, LLC APMEA	83.050.2012.13	5th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon, Haryana 122002 (PIN, India
	India Rep Office of Mastercard International Incorporated	NDL092000069	11th Floor, Tower D, Global Business Park, M.G. Road, Gurgaon, Haryana, Haryana, New Delhi 122002, India
	Finicity Technologies Private Limited	U72200MH2005PTC154044	Ellora Fiesta, Sector 11, Sanpada, Mumbai, India
	Mastercard Switching Services India Private Limited	U74999PN2021FTC203994	Fourth Floor, Wing-1, Business Bay, Survey No. 103, Hissa No. 2 Airport Road, Yerwada, Pune, Maharashtra 411006, India

	Mastercard Money Transfer Services India Private Limited	U67190PB1995 PTC015897	Lower Ground Floor, Office No. 6, City Square EH-197, Civil Lines, Jalandhar PB, 144001, India
	Mastercard Money Transfer Services India Private Limited	U67190MH201 0FTC206754	10th Floor, The Pavilion, Sneapati Bapat Road, Pune, Maharashta, 411016, India
Indonesia	PT Mastercard Indonesia	09.05.1.70.68000 8	Sentral Senayan 1, Lt. 17/117 E, JL., Asia Afrika No. 8, Central Jakarta, Indonesia,
Japan	Japan Branch of Mastercard Loyalty Solutions International Limited	708782	Cerulean Tower, 16th floor, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan
	Mastercard Japan K.K.	0110-01-051453	Cerulean Tower 16F, 26-1 Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan 150-8512,
	Mastercard Prepaid Management Services Japan KK	0110-01-069577	Cerulean Tower, 16th Floor, 26-1 sakuragaoka-cho, shibuya-ku Tokyo150-8512, Tokyo 100-8133, Japan
	Mastercard Services Japan Limited	Nepal Liaison Office of Mastercard Transaction Services (US) LLC NNN0110-03-006898	Cerulean Tower 16th Floor, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan
Malaysia	Malaysia Branch of Mastercard Asia/Pacific Pte. Ltd.	200402000010	Suite 3.1 & 3.2, Level 3, Menara 1 Dutamas, Solaris Dutamas, No 1, Jalan Dutamas 1, Kuala Lumpur, Malaysia 50480, Malaysia
	MASTERCARD TRANSACTION SERVICES (MALAYSIA) SDN BHD	1220440-D	43-2, Plaza Damansara, Jalan Medan Setia 1, Bukit Damansara, Kuala Lumpur Wilayah Persekutuan, 50490, Malaysia
Myanmar	Mastercard Myanmar Limited	127160295	Level 10, Unit 01-05, Junction City Officer Tower, Corner of Bogyoke Aung San Road and 27th Street, 11181 Pabaedan Township Yangon, Myanmar

Nepal	Nepal Liaison Office of Mastercard Transaction Services (US) LLC	159346	Ward No. 29, Anamnagar, Kathmandu, Nepal
New Zealand	Mastercard Loyalty Solutions New Zealand Limited	229 8309	Martelli McKegg, Level 20, Pwc Tower, 188 Quay Street, Auckland, 1010, New Zealand
	Mastercard New Zealand Limited	1893982	C/- Martelli McKegg, Level 20, PwC Tower, 188 Quay Street, Auckland, 1141, New Zealand
	Mastercard Prepaid Management Services (NZ) Limited	3261147	Level 3, MasterCard House, 136 Customs Street, West Auckland, 1010, New Zealand
Philippines	Mastercard Transaction Services (Philippines)~~,~~ Inc.	182094	Unit 2-7 Level 18 IBP Tower, Dona Julia Vargas Avenue, Ortigas Center, Pasig City, Philippines
	Philippines Branch of Mastercard International Philippines, ~~,~~ Inc.	A199915970	27/F Unit D, Tower One and Exchange Plaza, Ayala Triangle, Ayala Avenue, Makati City, Manila, Philippines
	Philippines Branch of Mastercard Singapore Holding Pte. Ltd.	FS201222408	Units 903 & 904 - 9th Floor, Tower One, Ayala Triange, Ayala Avenue, Makati City, Philippines
Singapore	Mastercard Asia/Pacific Pte. Ltd, Singapore	199306324E	3 Fraser Street DUO Tower, Level 17, Singapore 189352
	Access Prepaid Singapore Pte. Ltd.	201105746G	12 Marina View, #11-01 Asia Square Tower 2, 018961, Singapore
	Mastercard AP Financing Pte. Ltd.	201731499K	3 Fraser Street, #17-21/28, Duo Tower, 189352, Singapore
	Mastercard Labs Kenya Holdings Pte. Ltd.	201431144W	3 Fraser Street, DUO Tower 17-21/28, 189352, Singapore
	Mastercard Loyalty Solutions Singapore Pte. Ltd.	199302957W	10 Changi Business Park Central 2, #05-01, Hansapoint@CBP~~,~~ 486030, Singapore
	Mastercard Singapore Holding Pte. Ltd.	201008183D	3 Fraser Street, DUO Tower #17-21/28, 189352, Singapore (Registered Office)
	Mastercard VocaLink Asia Pacific Pte. Ltd.	201927008N	3 Fraser Street, #17-21/28, Duo Tower, Singapore, Singapore, Singapore

	Mastercard Transaction Services Singapore Pte. Ltd	201700267K	3 Fraser Street #17-, Duo Tower, Singapore 189352, Singapore
	Ekata Global - Singapore Pte. Ltd	201942960H	3 Fraser Street, DUO Tower, #17-21/28, Singapore 189352, Singapore
	Dynamic Yield APAC Pte. Ltd.	201702196R	12 Marina View, #11-01, Asia Square Tower 2, Singapore 018961, Singapore
South Korea	Mastercard International Korea Ltd.	113023	16F, Seoul Finance Center, 136 Sejongdaero Junggu, Seoul, 00-768, Republic of Korea
Sri Lanka	Sri Lanka Rep Office of Mastercard Singapore Holding Pte. Ltd.	1263	Regus 26, East Tower, World Trade Centre, Echelon Square, Colombo, Sri Lanka
	Transfast (Private) Limited	212470	Bernards Business Park, 2nd Floor, 106 Dutugemunu Street, Kohuwala, Dehiwala, Sri Lanka
Taiwan	Taiwan Branch of Applied Predictive Technologies, Inc.	2899-4556	42F., NO.68, SEC. 5, ZHONGXIAO E. RD., XINYI DIST., TAIPEI CITY, 11065, Taiwan
	MASTERCARD SINGAPORE HOLDING PTE. LTD., TAIWAN BRANCH	28987963	42 F, No. 68, Sec. 5, Zhongxiao E. Road, Zinyi District, Taiwan, Taiwan 110, Taiwan
Thailand	Mastercard (Thailand) Limited	105 558 076 584	1 Q House Lumpini Building, 16th Floor, Unit 1601, South Sathorn Road, Khwaeng Thungmahamek, Khet
	Thailand Branch of Mastercard Asia/Pacific Pte. Ltd.	100 538 031 378	Q House Lumpini Building Unit 1601, 16th Fl, 1 South Sathorn Road, Kwaeng Thungmahamek, Khet
Uzbekistan	Uzbekistan Rep office of Mastercard Europe SA	11001148595	7, Mustakillik Street, Mirzo-Ulugbek District, 100000, Tashkent, Uzbekistan, Uzbekistan
Vietnam	Vietnam Representative Office of Mastercard Asia/Pacific Pte. Ltd.	License No. 113/GP-NHNN	Ho Chi Minh City, Viet Nam,
	Mastercard Asia/Pacific Pte. Ltd. Representative	License No.: 102/GP.HAN-	28A Tran Hung Dao, Phan Chu Trinh ward, Hoan Kiem District,

	Office in Hanoi	TTGS2	Hanoi, Vietnam
FOR MIDDLE EAST & AFRICA:			
Country	**Mastercard BCRs Entity**	**Registration Number**	**Contact Details**
Bahrain	Bahrain Representative Office of Mastercard Singapore Holding Pte. Ltd	103106-1	904, 001 Building, 365 Street, 316 Block, Manama Center, Bahrain, Manama Center, Bahrain
Ivory Coast	Cote d'Ivoire, Abidjan, Rep Office of Mastercard Singapore Holding Pte Ltd	CI-ABJ-2017- B-6983	c/o Regus Abidjan, XL Plateau Centre, 6 floor, Unit 602, Corner of Dr. Crozet St., and Boulevard de la Republique, Plateau 01 BP 2785, Abidjan, Cote D'Ivoire
Egypt	Egypt Representative Office of Mastercard Middle East, Inc.	1016	13 Al Themar St., 10th Floor, Mohadessin, Cairo, Egypt
	Mastercard Egypt LLC	1976	Nile City Towers, North Tower, 16th Floor, 2005C Corniche El Nil, Cairo, Egypt
Ghana	Mastercard Ghana Limited	CS155212020	5TH FLOOR VIVO PLACE, CANTONMENTS, Rangoon St; P. O. BOX MB 595, Accra, Ghana
Jordan	Mastercard Asia/Pacific Pte. Limited/Jordan	44389	Business Park Development Zone/Amman, 26 Temp, 2 Alkursi, Gh 02, Third Floor - Office No. 3, Amman, Jordan
Kenya	Mastercard East Africa Limited	CPR/2011/5565 0	The Promenade, 5th floor, General Mathenge Drive, Westlands, P.P. BOX 2194-00606, Nairobi, Nairobi, Kenya
	Mastercard Labs Kenya Limited	CPR/2015/1742 95	-The Promenade, 5th floor, General Mathenge Drive, Westlands, P.O BOX 2194 – 00606, Nairobi, Nairobi, Kenya
Mauritius	Mastercard (Mauritius) Limited	190279	5th Floor Ebene Esplanade, 24 Bank Street, Cybercity, Ebene, Mauritius
Morocco	Morocco Branch of Mastercard Africa, Inc.	147505	Tour Crystal 1, 12th Floor, Boulevard Sidi Mohammed Ben Abdellah, Quartier Casablanca Marina

Nigeria	Mastercard Services Sub-Saharan Africa Limited	RC 1384603	7th Floor, Alliance Place, 33A Alfred Rewane Road, Ikoyi, Lagos, Nigeria
	Mastercard West Africa Limited	RC 889080	7th floor, Alliance place, 33A, Alfred Rewane road, Ikoyi, Lagos, Nigeria
	NYBER Nigeria Limited	1055739	Flat 3, block 34 Maryland Housing Estate, Maryland, Lagos State, Nigeria
	Trans-Fast Remittances Ltd.	1382856	Block 34, Maryland Housing Estate, Maryland Ikeja,Lagos Nigeria
Pakistan	Mastercard Pakistan (Private) Limited	0098089	JurisPK, C-5, Block No. 4, Clifton, Karachi, Pakistan, Pakistan
	Pakistan Rep Liaison office of Mastercard Transaction Services (US) LLC	114021	112 & 113, 1 Floor, Bahria Complex-III, M.T., Khan road, Karachi, Pakistan
Qatar	Mastercard Gulf LLC	QFC No. 00160	Al Fardan Office Tower, Office No. 2, 16th Floor, AlFardan Office Towers, West Bay, P.O. Box 21491, Doha, Qatar
Saudi Arabia	Saudi Arabia Branch of Mastercard Middle East, Inc.	1010192854	King Fahad Road, Al-Olaya Dist. Hamad Tower, Unit 301, P.O. Box 66749, Riyadh, Saudi Arabia 12212,
	Mastercard Arabia for Information Technology Co. Ltd.	201008183	2886 Northern Ring Rd, 6332 Al Aqeeq Dist.,Riyadh, Saudi Arabia 13511, Saudi Arabia
	(Saudi Arabia) Branch of Mastercard Transaction Services (US) LLC	41010949495	Suite 442, 4th Floor, Regus Hamad Tower, King Fahd Branch Rd, Al Olaya, Riyadh, Saudi Arabia 12212, Saudi Arabia
Senegal	Mastercard Dakar Bureau de Representation (rep office of Mastercard Singapore Holding Pte. Ltd.)	201008183D	SIA Building, 1st Floor, Route de Ngor,Les Almadies, Dakar Senegal
	Trans-Fast SAU	SN-DKR-2009-B-20224	Lot 30-C1, Sotrac Route de Ngor, Les Almadies 1st Floor SIA Building, Route de Ngor, Les Almadies 1st Floor SIA Building, Mermoz,Dakar, Senegal, Senegal
	Mastercard Transaction	SN-DKR-2009-B-	Route de Ngor, Les

	Services (Senegal) SAU	20224	Almadies 1st Floor SIA Building,Dakar, Senegal 10200, Senegal
South Africa	Mastercard Southern Africa (Pty) Ltd	2011/006482/07	2nd Floor, 23 Melrose Arch Boulevard, Melrose Arch, JOHANNESBURG, 2196, South Africa
Uganda	Orion Payment Solutions Limited	80034479903090	4TH FLOOR RWENZORI TOWERS, PLOT 6 NAKASERO ROAD, KAMPALA, Uganda, Uganda
United Arab Emirates	Mastercard Middle East Africa FZ-LLC	20564	FL1-Offices, 1 st Floor, Building MasterCard, Dubai, United Arab Emirates, United Arab Emirates
	Mastercard Transaction Services FZ-LLC	20624	FL1-FL2-FL3, Mastercard Building, Al Falak Street, P.O. Box 502093, Dubai Dubai, United Arab Emirates
	UAE Branch Office of Mastercard Transaction Services (US) LLC	11179	Leased Office Bldg Office No. 21, Hamriyah Free Zone – Sharjah, United Arab Emirates, United Arab, United Arab
Zimbabwe	Mastercard Zimbabwe (Private) Limited	13377/2019	1st Floor, Suite L, Sam Lavy's Village, Corner Piers & Borrowdale Road, Borrowdale, Harare, Zimbabwe, Zimbabwe
FOR LATIN AMERICA			
Country	**Mastercard BCRs Entity**	**Registration Number**	**Contact Details**
Argentina	Argentina Branch of Mastercard Mercosur, Inc	30-689904390	Olga Cossettini, #771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
	Mastercard Cono Sur S.R.L.	1776014	Edificio Porteno 1, Olga Cossenttini 771 2nd Floor, Buenos Aires, Argentina
	Latarg Holding S.R.L.	30717183467	Maipú 1300, 11th Floor, Buenos Aires, Argentina
Brazil	Access Prepaid Brasil Servicos de Cartoes S.A.	35.300.389.859	Bernadino de Campos 318, 6° andar, Brooklin, Sao Paulo, CEP 04621-0,

			Brazil
	Brasil Branch of Mastercard Brasil Solucoes de Pagamento Ltda.	05.577.343/000 2-18	SH/SUL Quadra 06, Conjunto A, Bloco 6, Sala 611, Centro Empresarial Brasil 21, Brasilia, 70.316-000, Brazil
	Mastercard Brasil Ltda.	CNPJ/MF 01.248.201/0001/ 75	Centro Empresarial Nacoes Unidas, Av. Das Nacoes Unidas 14.171, 20th Andar, Torre C - Crystal Tower, 0479-000, Brazil
	Mastercard Brasil Participacoes Ltda.	23.529.362/0001-70	Avenida das Nações Unidas, 14.171, Crystal Tower, 19º andar, São Paulo, 04794-000, Brazil
	Mastercard Brasil Soluções de Pagamento Ltda.	São Paulo Junta Comercial 150179/03-0	Condomínio Rochaverá, Av. Das Nacoes Unidas 14.171. 20th Andar, Torre C – Crystal Tower, Sao Paulo, Brazil
	Zargoje Participações Ltda.	21.793.694/0001-31	Naçoes Unidas Av., 14.171, 20o floor, Crystal Tower, São Paulo/SP, 04794-000, Brazil
	Truata Privacy Tech Brasil Limitada	42.355.178/0001-03	Rua Dom Jose de Barros, n 177, Conj.801-Parte, 8th Floor, Center,Sao Paulo, Brazil 01.038-901, Brazil
	Mastercard Brasil Ltda.	CNPJ/MF 01.248.201/0001/ 75"	Centro Empresarial Nacoes Unidas, Av. Das Nacoes Unidas 14.171, 20th Andar, Torre C - Crystal Tower, Sao Paulo, 0479-000, Brazil
Chile	Chile Representative Office of Mastercard International Incorporated	3998/93	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
	Mastercard International Incorporated Chile Limitada	17658	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
Colombia	Colombia Branch of Mastercard Colombia, Inc.	640275	Santa Fe, Bogota, Colombia
	Mastercard Colombia Administradora S.A.	02735104	Carrera 11 No. 84-09 Entrada Norte, Piso 8 Oficina 801, Bogota, Colombia
	Arcus FI S.A.S	901.389.502-4	CI 70 No.7 60 of 302, Bogota, Colombia
Costa Rica	Mastercard Costa Rica Billing Services S.R.L.	3-102-789914	Sexto Piso De Torre Lexus, Oficina Numero Ae, Sobre La Calle

			Marginal, De La Ruta Nacional Numero Veintisiete, San Jose-Escazu San Rafael, Costa Rica
	Mastercard Costa Rica, S.R.L	3-102-607815	Torre Lexus, Piso 6, Avenida Escazú, San Rafael de Escazú, San Jose, Costa Rica, Costa
Dominican Republic	Mastercard Republica Dominicana, SRL	1-31-36908-1	Rafael Augusto Sanchez No. 86, Torre Empresarial: Roble corporate center, Piso 7, Piantini, Santo Domingo, Dominican Republic
	Optimización de Recursos Regalii Dominicana SRL	123120SD	Victor Garrido Puello No. 148, Distrito Nacional, Dominican Republic
Ecuador	Ecuador Branch of Mastercard Ecuador, Inc.	1792163846001	Av. 6 de Diciembre y Luis Cordero, Edif. Novus, Ofic. 401, Quito Ecuador
Guatemala	Mastercard Guatemala Servicios Limitada		Septima Avenida 5-10, Centro Financiero Torre I, Nivel 16, Ciudad de Guatemala, Guatemala
Jamaica	Jamaica Branch Office of Mastercard Latin America Holdings, Inc.	1943 (Overseas)	Panjam building, Ninth floor, 60 Knutsford boulevard, Kingston 5, Kingston, Jamaica
Mexico	IfOnly Mexico S.A.P. I de CV	551276-1	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, Mexico 06600, CDMX,
	Mastercard Mexico Billing Services, S. de R.L. de C.V.	492297	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez,Del Cuauhtémoc, 06600, Mexico
	Mastercard Mexico, S. de R.L. de C. V.	332409-BIS	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez,Del Cuauhtémoc, 06600, Mexico
	Mexico Representative Office of Mastercard International Incorporated	N/a	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez,Del Cuauhtémoc, 06600, Mexico
	Arcus F.I. S.A de C.V.	N-2018065707	Coahuila, City of Saltillo, Mexico
	Optimización de Recursos Regalii S. de R.L. DE C.V	1296*7	Calle Turin 315, Colonia Villa Olímpica Oriente, Coahuila, Saltillo 25230,

			Mexico
	Mastercard Transaction Services LAC, S. de R.L R.L. de C.V.	N-2017040165 N-2017040165	Av. Las Americas 187, 1 Las Americas Morelia, Morelia Michoacan, CP 58270, Mexico
Panama	Mastercard Panama S. de R.L.	929481	Urbanizacion Costa del Este, Avenida a Rotonda, Edificio Prime Time Tower, Piso 6, Corregimiento de Juan Diaz, Panama City, Panama
Paraguay	Mastercard Paraguay S.R.L.	1077	AVENIDA BRASILIA 707, CASI SIRIA, ASUNCIÓN, Paraguay
Peru	Peru Branch of Mastercard Peru, Inc.	11175092	Avenida El Derby 055, Torre 1, 5th Floor, Oficina 501, Edificio Cronos, Santiago de Surco, Lima, Peru 27, Peru
Trinidad And Tobago	Trinidad and Tobago branch of Mastercard Latin America Holdings, Inc.	E2021012003821	2000 Purchase Street, Purchase, New York 10577, United States
Uruguay	Mastercard Uruguay Limitada	22353	Clemente PRADINES 1795, Montevideo, Uruguay 11500, Uruguay
Venezuela	Venezuela Branch of Mastercard Spain Holdings, S.L.	221-38685	Calle Madrid entre Trinidad y Mucuchies, Torre Centro Financiero Madrid, piso 9, Urb. Las Mercedes. Municipio Baruta, Caracas, Venezuela
	Venezuela Branch of Mastercard Venezuela, Inc.	16, vol. 57-A-4th	Calle Madrid entre Trinidad y Mucuchies, Torre Centro Financiero Madrid, piso 9, Urb. Las Mercedes. Municipio Baruta, Caracas, Venezuela

The Privacy & Data Protection Team will assess on a case-by-case basis the data transfer practices of any newly acquired companies that have not yet signed Mastercard's Intra-group Agreement and implement appropriate interim data transfer solutions, including contractual guarantees.

Appendix 2 Glossary

Account Servicing Payment Services Provider ('ASPSP') – means the entity that provides a payment account for an Individual and which permit payments initiated by TPPs and/or make the Individual's account transaction data available to TPPs.

Account Information Service – means an online service to provide consolidated information on one or more payment accounts held by an Individual with either another payment service provider or with more than one payment service provider.

Applicable Law – means any laws, ordinances, constitutions, regulations, statutes, treaties, rules, principles of common law or other statutory requirements applicable to Mastercard BCRs Entities.

Data Controller – means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Information.

Data Exporter – means a Mastercard BCRs Entity in the EEA that transfers Personal Information to a Mastercard BCRs Entity out of the EEA.

Data Importer - means a Mastercard BCRs Entity located outside the EEA that receives Personal Information from a Mastercard BCRs Entity.

Data Processor – means the natural or legal person, public authority, agency or any other body which processes Personal Information on behalf of and under the instructions of the Data Controller.

Supervisory Authority or SA – means the independent public authority supervising compliance with privacy and data protection legislation.

Competent SA- means the Belgian Supervisory Authority, unless another EEA Supervisory Authority is competent for the Data Exporter.

Employee – means past, present and prospective employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard.

EEA – means the European Economic Area, comprised of the EU Member States plus Iceland, Liechtenstein, Norway and Switzerland.

EU Data Protection Law – means: (1) the GDPR and the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC) and their national implementing legislations; (2) the Swiss Federal Data Protection Act; (3) the Data Protection Acts of the EEA countries (all the above as amended and replaced from time to time).

GDPR – means the EU General Data Protection Regulation 2016/679 (as amended and replaced from time to time).

Individual – means an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law) to whom the Personal Information pertains.

Intra-group Agreement – means the intra-group agreement that binds Mastercard BCRs Entities to the BCRs.

Mastercard – means the Mastercard Group composed of Mastercard International Incorporated, Mastercard Europe SA, their subsidiaries and affiliates.

Mastercard BCRs Entity(ies) – means the Mastercard entities that are bound by the BCRs and have duly executed the Intra-group Agreement (listed in Appendix 1).

Mastercard Rules – the Rules for the Mastercard, Maestro and Cirrus brands, as available at http://www.mastercard.com/us/merchant/pdf/BM-Entire_Manual_public.pdf.

Mastercard Staff – Employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard and who are bound by the BCRs.

Payment Initiation Service - means a service to initiate a payment order at the request of an Individual with respect to a payment account held at another payment service provider**.**

Personal Data Breach – means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information transmitted, stored or otherwise processed.

Personal Information – means any information relating to an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law), an identifiable natural or legal person is one who can be identified, directly or indirectly, in particular by reference to an identification number (such as the personal account number) or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Processing – means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Sensitive Data – means any Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data or biometric data processed for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, as well as any other type of data that will be considered to be sensitive according to any future revision of EU Data Protection Law.

Sub-Processor – means the entity engaged by the Data Processor or any further sub-contractor to process Personal Information on behalf of and under the instructions of the Data Controller.

Third Party Provider ('TPP') – means the legal or natural person that provides account initiation services or payment initiation services to an Individual.

Mastercard UK Binding Corporate Rules

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External Version

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I. Summary

Mastercard is a technology company in the global payments industry that connects Individuals, financial institutions, merchants, governments, public sector bodies, and businesses worldwide. We facilitate the processing of payment transactions permitting Mastercard cardholders to use their cards and other payment technologies at millions of merchants and allowing Individuals, financial institutions, businesses, public sector bodies and businesses to complete payments among themselves. Our network provides Individuals and businesses with a quick, convenient and secure payment method that is accepted worldwide. Our mission is to make payments safe, simple and smart.

To support that mission Mastercard has established a comprehensive privacy and data protection program. We dedicate significant global resources to ensure compliance with applicable data protection laws and we have embedded privacy and data protection into the design of our products and services.

We take privacy and data protection seriously at Mastercard. We have a dedicated Privacy & Data Protection Team that is led by our Chief Privacy Officer who reports to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee who reports to Mastercard's Chief Executive Officer.

Mastercard conducts the following types of data Processing activities:

- **Payment processing.** As a processor of payment transactions, Mastercard obtains and processes Personal Information about cardholders and other Individuals from customers (e.g., issuing financial institutions (issuers), acquiring financial institutions (acquirers), merchants, public sector bodies, partners (e.g., digital wallets) and other businesses) to facilitate payment transactions;

- **Fraud prevention and detection**. Mastercard collects and processes Personal Information of Individuals to prevent, identify, detect, and protect against any type of fraud;

- **Direct-to-consumer services.** Mastercard collects and processes Personal Information of Individuals (e.g., name, email, telephone number, type of payment card) to provide services and programs directly to them or benefitting them, such as loyalty and rewards programs, digital wallets, cardholder services, marketing programs and promotions;

- **Open banking services**. Mastercard provides connectivity services (as a technical service provider), between and on behalf of Account Servicing Payment Service Providers ("ASPSPs") and Third Party Providers ("TPPs")), Account Information Services and Payment Initiation Services as a TPP, as well as financial analysis services.

- **Customer management.** Mastercard collects and processes Personal Information of staff of customers, merchants, suppliers and vendors (e.g., business contact information) to contact them, to manage business relationships and to offer support services; and

- **Employee management.** Mastercard collects and processes Personal Information of Employees (e.g., name, salary, benefits, education, work experience), including information about contractors or job applicants. The information is used to manage the employment relationship and job application process.

If you are an Employee, please consult the internal version of Mastercard BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our BCRs. We will provide you with a copy of our internal Mastercard BCRs upon request if you e-mail us at privacyanddataprotection@mastercard.com.

For our "core" payment processing activities, Mastercard acts as Data Processor on behalf of our financial institutions, merchants, customers and partners. For other activities such as programs offered directly to Individuals or employment-related activities, Mastercard acts as Data Controller. Mastercard has established a comprehensive privacy and data protection program and applies a holistic approach whether we act as Data Processor or Data Controller.

Mastercard is committed to comply with UK Data Protection Law, in particular the Data Protection Act 2018, which includes the UK GDPR and the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC and replaced from time to time), as implemented into UK national legislation.

Mastercard's UK Binding Corporate Rules (referred to as "UK BCRs" throughout the document) are part of our privacy and data protection program and are aimed at facilitating the transfer of Personal Information to and among Mastercard UK BCRs entities worldwide in compliance with UK Data Protection Law. However, where Applicable Law, for instance applicable national data protection law, requires a higher level of protection for Personal Information, it will take precedence over the UK BCRs. Regardless of the latter, the principles set out in Article 5 of the UK GDPR will always be complied with.

Our UK BCRs cover data Processing activities where we act either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules specified in our UK BCRs apply to both types of activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

At Mastercard, Personal Information is:

Processed fairly and in a transparent manner

Processed only if Mastercard can rely on a valid legal ground

Protected with additional safeguards if it is considered to be Sensitive Information

Adequate, relevant and not excessive, kept accurate and up-to-date

Processed for specified and compatible purposes, and not retained unnecessarily

Processed in accordance with Individuals' rights

Only used for automated processing in compliance with the law

Processed using operational and technical safeguards

Only processed by Processors if adequate protections exist

Mastercard Europe Services Limited, 10 Upper Bank Street, Canary Wharf, London, E14 5NP, United Kingdom, is the entity responsible for compliance with the UK BCRs in the UK. Mastercard Europe Services Limited accepts liability for any breach of the UK BCRs caused

by another Mastercard entity located outside of the UK, including any Data Processor or Sub-Processor used by Mastercard. The Data Protection Authority competent for the supervision of Mastercard Europe Services Limited is the Information Commissioner ("ICO").

In addition, in the UK, Mastercard is subject to regulatory oversight, including but not limited to the oversight of the Payment Systems Regulator and the Bank of England. Mastercard entities may also be subject to other oversight in the UK under applicable regimes.

All Mastercard UK BCRs Entities are bound to comply with the UK BCRs requirements by an Intra-group Agreement. The Privacy & Data Protection Team will ensure compliance with the UK BCRs under Senior Executive oversight as well as internal and external reviews and audits.

Individuals have the right to lodge a complaint with the ICO if they believe that the UK BCRs have been breached.

Please refer to Glossary for capitalized terms used in this document.

II. Duty To Respect The UK BCRs

The UK BCRs set the standards that Mastercard satisfies when processing Personal Information about Individuals either as a Data Controller or as a Data Processor.

Mastercard's UK BCRs are binding on all Mastercard UK BCRs Entities and on all Mastercard Staff Processing Personal Information as follows:

1. The Mastercard UK BCRs Entities are bound by an Intra-group Agreement to respect the UK BCRs. The Mastercard UK BCR Entities that are covered by the UK BCRs and have signed Mastercard's Intra-group Agreement are listed in **Appendix 1**.

2. The Mastercard Staff are bound by the UK BCRs in two ways. First, the Mastercard Staff are required to sign a binding employment contract, which requires employees to comply with the Code of Conduct, all Mastercard policies, and a duty not to disclose or misuse Personal Information. In addition, the Mastercard Staff is required to sign a declaration that they abide by the Code of Conduct and recertify adherence to the Code of Conduct on an annual basis. Adherence to the Code of Conduct requires adherence to all Mastercard's policies, including Mastercard UK BCRs.

III. What Do Our UK BCRs Cover?

Mastercard's UK BCRs apply to all Mastercard UK BCRs Entities that process Personal Information either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules of our UK BCRs apply to both types of Processing activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

1. Geographical Scope

Our UK BCRs cover all Processing of Personal Information, which is or was subject to UK Data Protection Law, and is conducted by Mastercard UK BCRs Entities worldwide, including

the Processing of Personal Information that is transferred and processed by a Mastercard UK BCRs Entity outside of the UK and the Processing of Personal Information that was subject to UK Data Protection Law and is onward transferred from a country outside of the UK. Our UK BCRs apply to all Mastercard UK BCRs Entities worldwide; a list of countries where Personal Information may be transferred is attached in Appendix 1.

2. Material Scope

Our UK BCRs cover the Processing of Personal Information described in this section.

Mastercard receives most of its data when it processes payment transactions; however, we receive a limited number of Personal Information to process these payment transactions. When we process payment transactions, we typically receive the following Personal Information: the personal account number, the merchant's name and location, the date, time and the total amount of the transaction. Except as otherwise indicated in the chart below, we do not receive the cardholder's name or other contact information. Nor do we receive information about the type of product or service that is purchased.

In addition to our core payment transaction processing activities, we also:

- offer some engagement programs, such as loyalty and rewards programs. To enable such programs, we collect Personal Information, such as the Individual's name and their email address. Individuals are provided with a privacy notice for these programs, which describes the type of Personal Information we collect and how we process it. Personal Information is collected directly from Individuals or provided by Mastercard customers. We keep the Personal Information collected in the context of such programs segregated from Personal Information processed for payment processing, unless otherwise specified in the program-specific privacy notice.

    - offer debit payment and cheque processing services. When we process Personal Information for debit payment and cheque processing services, we may process additional Personal Information such as the Individual's name, information that relates to the financial institutions (e.g., sort code), any reference in a free text field, the Individual's signature, and in limited situations other unique identifiers.

- offer fraud prevention and detection services. Mastercard collects and processes Personal Information of Individuals, such as IP address, physical address and phone number, to prevent, identify, detect, and protect against any type of fraud. We may share such Personal Information with customers as part of our fraud prevention and identity verification services.

- offer open banking services. When we process Personal Information either for ASPSPs and TPPs or at the request of business customers or the Individual, we may process additional Personal Information, such as an Individual's bank account details, transaction data, the type of open banking service requested, and other identifiers. Where we act as a Data Controller, Individuals are provided with a privacy notice specific to the open banking services.

In more detail, we process the following categories of Personal Information, depending on the type of services provided, whether we act as a Data Controller or a Data Processor, the purpose of the Processing and the categories of Individuals:

Mastercard's Role	Purposes	Types of Personal Information
Processor	Authorizing, clearing and settling transactions on behalf of our financial institutions, merchants, customers and partners.	Personal Information of **cardholders and other Individuals**, such as: • Card data (e.g., card expiration date, Card Verification Value (CVV) and card country code). • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant, card expiration date, Card Verification Value, card country code). • Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number, free text reference, Individuals' signature for cheque and other unique identifiers).
Processor	Cross-border and domestic account to account payments on behalf of our financial institutions and corporate customers	Personal Information of **account holders, beneficiaries and other Individuals**, such as: • Data related to fund transfers (e.g., personal account number, associated codes, name and location of the payee). • Contact information (e.g., name, phone number) as well as other information (e.g. date of birth, government ID) when provided by financial institutions and corporate customers.
Processor	Supporting our customers' issuing and acquiring business.	Personal Information of **cardholders**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Contact information (e.g., name, postal or email address, phone number) as well as other information (e.g. date of birth, gender, government ID) as/when provided by cardholders (for card registration purposes), issuers and acquirers. • Additional information provided by cardholders or merchants (e.g., delivery address, product codes).

		Personal Information of staff at **financial institutions and merchants**, such as: • Contact information (e.g., business email address, business postal address, business telephone number, job title). • Where UK Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.
Controller or Processor depending on activity	Preventing cardholder disputes, enhancing cardholder visibility into transactions and facilitating cardholder dispute resolution and chargeback procedures.	Personal Information of **cardholders and other Individuals**, such as: • Data necessary for cardholder dispute resolution and subscription management services (e.g., transaction data, such as personal account number, and date/time/amount/location/currency of the transaction; cardholder contact information, device-related information; merchant details, order details (e.g. items purchased, billing or shipping address, subscription ID); information about the dispute, and other unique identifiers for payment and cheque processing services).
Controller or Processor depending on activity	Enabling the connectivity, maintenance and operation of our open banking services.	Personal Information of **Individuals**: • Account and payment data (e.g. transaction data, such as personal account number, date/time/amount/ description of the transaction, name and location of the payee), as well as other financial information. • Open banking request and response information (e.g., requests and responses, Account Information Service requests and responses, request reference number, and response status). • Electronic identification data (e.g. username, password, country of residence, security questions, IP address, logs). • Device-related information (e.g., user device IDs). Personal Information of staff at **ASPSPs, TPPs, financial institutions and customers**, such as: • Contact information (e.g. business email address, business postal address,

		business telephone number, job title). • Electronic identification data (e.g. username, password, security questions, IP address).
Controller	Accounting, auditing and billing.	Personal Information data of **staff at financial institutions, merchants, customers and partners**, such as: • Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title). • Where UK Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.
Controller	Managing customer relationships and financial reporting, including relationships with financial institutions, merchants, customers and partners.	Personal Information of **staff at financial institutions, merchants, customers and partners**, such as: • Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title). • Where UK Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.
Controller	Managing suppliers and vendors.	Personal Information of **staff at suppliers and vendors**, such as: • Contact information of persons at suppliers and vendors (e.g., business email address, business postal address, business telephone number, job title).

Controller or Processor depending on activity	Marketing activities of Mastercard or our customers, including offers, sweepstakes, online personalization, contests and promotions.	Personal Information of **consumers and (customer) website users (whether or not cardholders)**, such as: • Contact information (e.g., name, postal or email address, phone number). • Electronic identification data (e.g., username, password, security questions, IP address). • Device-related information (e.g., user device IDs, browser information, online identifiers, user interactions with and preferences on websites and applications). • Data collected in the context of online marketing programs and other promotional activities, such as contests (e.g., personal characteristics, life habits, consumption habits, interests, geo-location data, and voice and image recordings, contest responses). • Any other information provided by customers.
Controller	Compliance with Applicable Law, regulations and law enforcement requests.	Personal Information of **Individuals, cardholders and staff at financial institutions, merchants, customers and partners**, such as: • Data required for legal compliance (e.g., know your customer information for anti-money laundering compliance, responding to Individuals' requests).
Controller	Talent acquisition and Employment-related purposes, such as managing Mastercard's workforce, work planning, training and development, talent management, facilitating communication with and between the workforce, managing emergencies (such as ensuring business continuity and protecting health and safety), Human	Personal Information of prospects, candidates, former and current **Employees and other Mastercard staff**, such as: • Contact information (e.g., name, address, email address and telephone number, date and place of birth, Social Security number or other national identification number). • Payroll data (e.g., banking details, corporate credit card number and transaction details). • Information on an Individual's position (e.g., current position, title, salary plan, pay grade or level, employee ID). • Talent management information (e.g., application information, resume/CV,

	Resources- administration (including payroll and compensation management), maintaining a directory of former employees and Prospects.	previous employment background, education history). • Applicant data (e.g., current and previous employers, job titles, dates of employment, resume/CV information). • Compensation information (e.g., base salary, bonus, benefits, pay enhancements for dependents, performance appraisals). • Internal reports and compliance information (reports on compliance and disciplinary issues within the organization, including gift logs and, where applicable, whistleblowing reports). • Management records (details of any shares of common stock or directorships).
Controller	Corporate security purposes, such as integration planning and controlling security of premises and logical systems	• System and application data of Employees and other staff, as well as security control data (including any information required to access company systems and applications, information about employees' use of technology resources, and photographs and other visual images, such as CCTV images). • Visitor data (e.g. registration data, CCTV images).
Controller or Processor depending on activity	Fraud prevention and detection, cybersecurity and cyber resilience, authentication, digital identity, financial crime and risk management.	Personal Information of **cardholders and other Individuals**, such as: • Fraud related payment data (e.g., personal account number, date/time/amount of the transaction, items purchased, name, merchant's details and location). • Biometric data for authentication purposes (e.g., photographs, voice, fingerprint). • Online fraud and authentication data (e.g.,–IP address, users' details such as name, email address, physical address and phone number, merchants' details and, online behaviour). • Cybersecurity and cyber resilience related data (e.g., IP addresses, IP header, source/destination port, TCP/UDP headers). • Information gathered from the

		blockchain (e.g., alias associated with a blockchain address, blockchain address, IP address) and cryptocurrency transaction data (e.g., date/time/amount of the transaction, transaction unique identifier, balance or amount attached to the blockchain address, participating blockchain addresses, and location. • Contact information (e.g., name, address), as well as ID cards, where permitted by and in accordance with applicable law, and reason codes when attributed to sole proprietor merchants. • Device-related information (e.g., users' device IDs, browser information, users' interactions with the device, website and applications) • Financial crime data (e.g., data about money laundering, terrorist financing, bribery, corruption and other unlawful activities) both on traditional rails and cryptocurrency. • Location data. • Fraud score, type of fraudulent activity and confirmed fraudulent activity, validation of identity verification. • Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number and other unique identifiers, free text reference, Individuals' signature for cheques). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners and data derived from our analysis of such information.
Controller	Internal research, reporting and analysis	Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.

Controller or Processor depending on activity	Providing products and services benefiting Individuals, including rewards programs, eWallets, tokenization services, prepaid services, and processing donations.	Personal Information of **cardholders and other Individuals**, such as: • Loyalty and rewards data (e.g., cardholder name, e-mail address, billing or shipping address, phone number, personal account number, transaction data). • Device-related information (e.g., user device IDs, browser information, online identifiers). • User engagement data (e.g., user interactions with and preferences on websites and applications). • e-Wallet and prepaid registration data and tokenized payment credentials (e.g., cardholder name, e-mail address, billing or shipping address), phone number, personal account number, card expiration date, card verification code, transaction data). • Biometric data for authentication purposes (e.g., photographs). • Non-biometric data for authentication purposes (e.g., authentication methodology, authentication confirmation) • Client relationship management data and other data that a customer provides in the context of the services (e.g., loyalty status).
Controller or Processor depending on activity	Providing products and services directly to financial institutions, corporate clients, merchants, customers and partners, including for commercial payment services, statistical reports and tools, prepaid management services, customer service support.	Personal Information of **staff at financial institutions, corporate clients, merchants, customers and partners**, such as: • Contact information or identifying details of persons at financial institutions, corporate clients, merchants, customers and partners (including but not limited to business or personal email address, business or personal postal address, business or personal telephone number, job title, date of birth, country of origin, social media accounts and information, IP addresses). • Where UK Data Protection Law applies to legal entities, Personal Information includes name, address of merchants, contact details such as email, phone numbers, merchant category (e.g.,

		airline) and ID numbers. Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Data received for cardholder support (e.g., data received at a call centre) or cardholder services (i.e., data to support emergency card replacement services). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Processor	Providing data analytics products and services to financial institutions, merchants, corporate clients and partners with their instructions.	Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Controller	Anonymizing data for the purposes of developing and providing data analytics products and services	Personal Information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Controller	Establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies	Personal Information of **Individuals, cardholders and staff at financial institutions, merchants, customers and partners**, such as: • Data required to establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies.

If you are an Employee, please consult the internal version of Mastercard UK BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard UK BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our UK BCRs. We

will provide you with a copy of our internal Mastercard UK BCRs upon request if you e-mail us at privacyanddataprotection@mastercard.com.

IV. How Do We Protect Personal Information?

Personal Information is key to Mastercard's business activities. For our business to function we must handle Personal Information with keen sensitivity to privacy and security standards in order to protect Personal Information on behalf of all the members of our global payment network. Our company is committed to the protection of Personal Information and to compliance with relevant laws.

Mastercard first and foremost complies with UK Data Protection Law. The Mastercard UK BCRs Entities comply with UK data protection principles both when we act as a Data Controller and where we act as a Data Processor. However, where Applicable Law requires a higher level of protection for Personal Information, it will take precedence over the UK BCRs.

1. When we act as a Data Controller, we establish processes and procedures to ensure compliance with all requirements of UK Data Protection Law.

2. Where we act as a Data Processor, we process Personal Information on behalf of the Data Controller and upon its instructions as provided in the Mastercard Rules or in a specific agreement between Mastercard and the Data Controller.

The following describes how we respect the principles of UK Data Protection Law, including how we cooperate with our customers to ensure respect of those principles:

1. Transparency & Fairness

The Mastercard UK BCRs Entities provide Individuals with clear information on how we process Personal Information.

Transparency is a key value at Mastercard. We provide Individuals with a number of online and offline privacy notices, including our Global Privacy Notice and program-specific privacy notices. All our privacy notices include, at the minimum, the information required by the UK GDPR (such as the identity and contact details of the controller and the Data Protection Officer, the purpose(s) of the Processing and related legal grounds, the categories data recipients, and data transfers), and a link to the UK BCRs.

Our UK BCRs inform Individuals about:

(i) the data protection principles we apply when processing Personal Information (Section IV);

(ii) the liability regime applicable to such Processing (Section VI);

(iii) their third party beneficiary rights with regard to such Processing and how to exercise those rights (Section VI.2).

All Individuals have the right to easily access the UK BCRs. A public version of the UK BCRs

will be published on Mastercard's public website, and Mastercard UK BCRs will be available on Mastercard's intranet.

2. Legal Ground For Processing

The Mastercard UK BCRs Entities only process Personal Information if they can rely on one of the limited legal grounds provided by UK Data Protection Law.

When a Mastercard UK BCRs Entity acts as a Data Controller, our Privacy & Data Protection Team reviews Personal Information Processing operations and ensures that the Processing is based on a legal ground for processing Personal Information, including for example:

- Individuals have unambiguously given their consent to the Processing of Personal Information;
- The Processing is necessary for the performance of a contract to which the Individual is a party or in order to take steps at the request of the Individual prior to entering into a contract;
- The Processing is necessary for compliance with a legal obligation or other regulatory obligations; or
- The Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by the third party or parties to whom Personal Information is disclosed, except where such interests are overridden by the interests or fundamental rights and freedoms of the Individual.

Where we act as Data Processor, we process Personal Information at the direction of the Data Controller who is responsible for ensuring a valid legal ground for the Processing.

3. Sensitive Data

The Mastercard UK BCRs Entities only collect Sensitive Data when absolutely necessary for the purpose of the Processing and if they can rely on one of the limited legal grounds provided under UK Data Protection Law.

Certain categories of Personal Information are Sensitive Data and receive a higher level of protection under UK Data Protection Law.

When a Mastercard UK BCRs Entity acts as a Data Controller, we process Sensitive Data only in limited circumstances, and will not process Sensitive Data unless the Processing is based on a legal ground for processing Sensitive Data, including for example:

- Individuals have given their explicit consent to the Processing;
- The Processing relates to Sensitive Data which is manifestly made public by the Individual;
- The Processing is necessary for the establishment, exercise or defence of legal claims by Mastercard;
- The Processing is necessary for the purpose of carrying out the obligations and specific rights of Mastercard in the field of employment law;
- The Processing is necessary for archiving purposes in the public interest, scientific

or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR as applicable under UK Data Protection Law; or

- The Processing is necessary to protect the vital interests of the Individuals or another person where the Individual is legally or physically incapable of giving his or her consent.

In addition, the Processing of Personal Information relating to criminal convictions and offences shall only take place if it meets the requirements of UK Data Protection Law, in particular Article 10 of the UK GDPR.

4. Data Quality

The Mastercard UK BCRs Entities comply with the data quality principle.

When a Mastercard UK BCRs Entity acts as a Data Controller:

- The Mastercard UK BCRs Entities ensures that Personal Information is:
    - Kept up-to-date (data accuracy);
    - Adequate, relevant and not excessive in relation to the purpose for which the information was collected and processed (data minimization);
    - Not retained for longer than is necessary for the purpose(s) for which it was originally collected, unless legislation requires us to maintain it (limited storage periods).
- Our transaction processing system is designed to minimize the amount of Personal Information collected and for that purpose relies primarily on the personal account number (and not on other directly identifiable information).
- We have implemented a records retention policy that sets out the appropriate time periods for which the Mastercard UK BCRs Entities will retain data, including Personal Information, in accordance with Applicable Law.

When a Mastercard UK BCRs Entity acts as a Data Processor, it will cooperate with and assist the Data Controller to comply with UK Data Protection Law, in particular it will comply with requests from the Data Controller:

- To update, correct or delete Personal Information, and will inform all Mastercard UK BCRs Entities to whom the data have been disclosed of the required update, correction or deletion of the Personal Information.
- To delete or anonymize the Personal Information as of the date when there is no justification to the retention of the data in an identified format, and will inform all Mastercard UK BCRs Entities to whom the Personal Information have been disclosed of the required deletion or anonymization of the Personal Information.

The Mastercard UK BCRs Entity acting as a Data Processor will comply with the above requests unless legislation imposed upon the Mastercard UK BCRs Entity prevents it from returning or destroying all or part of the Personal Information, in which case it will protect the confidentiality of the Personal Information and will not actively process it anymore.

5. Purpose Limitation

Mastercard UK BCRs Entities only collect Personal Information for specified, explicit and legitimate purposes and do not further process it in a way incompatible with those purposes.

When a Mastercard UK BCRs Entity acts as a Data Controller, we ensure that Personal Information is collected and processed only for specific and legitimate purposes and that it is not further processed in ways incompatible with the purposes of the collection.

One of the ways Mastercard ensures compliance with this principle is by embedding privacy and data protection standards into the product development lifecycle. As part of our product development process, the Privacy & Data Protection Team reviews the collection and use of Personal Information on a case-by-case basis to ensure that the Processing is undertaken for specific and legitimate purposes and is compatible with the purpose for which the Personal Information was collected. We embed these requirements into our technology wherever feasible to do so.

When a Mastercard UK BCRs Entity acts as a Data Processor, we comply with the following requirements:

- We only process Personal Information on behalf of the Data Controller and in compliance with its instructions, including with regard to transfers of Personal Information to a third country. If a Mastercard UK BCRs Entity cannot comply with the Data Controller's instructions, it will inform promptly the Data Controller of its inability to comply, if possible before the Processing takes place, and unless a law prohibits such notice on important grounds of public interest. Once the Data Controller is notified, it is entitled to suspend the transfer of Personal Information and/or terminate the contract.

- We take steps to return, destroy or fully anonymize the Personal Information of our customers, acting as Data Controllers, on the termination of the provision of services related to the data Processing, unless otherwise legally permitted to continue processing the data (in which case we will only process the data to the strict extent legally permitted).

- We fully cooperate with our customers to assist them in their role as Data Controllers to fulfil their data protection compliance obligations in accordance with UK Data Protection Law.

- When we use our Sub-Processors, including internal Sub-Processors, we make sure they process the Personal Information in line with the instructions of our customers acting as Data Controllers.

6. Rights Of Individuals

The Mastercard UK BCRs Entities comply with Individuals' requests to exercise their rights under UK Data Protection Law.

When a Mastercard UK BCRs Entity acts as a Data Controller, we ensure that Individuals can exercise their right to:

- Access copies of Personal Information relating to them and receive some Personal Information in a structured, commonly used and machine-readable format to transmit it to another Data Controller;

- Obtain rectification or erasure of Personal Information relating to them or

restriction of the Processing;

- Object, on grounds relating to their particular situation, to the Processing of their Personal Information;

- Object to the Processing of their Personal Information for the purpose of direct marketing.

Where we act as Data Processor, we require our customers to develop and implement appropriate procedures for handling Individuals' requests exercising their rights to access, rectify, or erase their Personal Information, restrict or object to the Processing of their Personal Information, or exercise their right to data portability. We do not reply to Individuals' requests to exercise their rights unless authorized or required to do so by our customers, but instead transmit them to our customers. We cooperate and support our customers in responding to such Individuals' requests, and have implemented technical and organizational measures for that purpose.

7. Automated Decision Making

The Mastercard UK BCRs Entities comply with the restrictions applicable to automated decisions making under UK Data Protection Law.

When a Mastercard UK BCRs Entity acts as a Data Controller, we ensure that Individuals are not subject to a decision which produces legal effects or that similarly significantly affects them and which is based solely on automated Processing of Personal Information, including Processing intended to evaluate certain personal aspects relating to them, such as their performance at work, creditworthiness, reliability, conduct, unless the Processing is:

- Necessary for entering into or performing a contract between the Individual and Mastercard;

- Authorized by a law requiring that measures be implemented to safeguard the Individual's legitimate interests.

- Authorized by the Individual who has provided his or her explicit consent to such Processing.

When the processing is based on Individuals' consent or is necessary for entering into or performing a contract, Mastercard will implement safeguards to protect Individuals' rights, freedoms and legitimate interest, at least the right to obtain human intervention, to express his or her point of view and to contest the decision.

8. Data Security

The Mastercard UK BCRs Entities implement appropriate technical and organizational measures to protect Personal Information.

Information security is at the heart of Mastercard's business model. Mastercard continuously innovates to make electronic payments even more secure. We have introduced chip and pin technology and more recently the digitization and tokenization of payment cards on electronic devices. Mastercard and its peers developed the industry standard for the protection of payment card data (Payment Card Industry PCI data security standards) that is used globally by all parties involved in processing card transactions, including financial institutions and merchants.

Mastercard has implemented and commits to maintain a comprehensive written information security program that complies with UK Data Protection Law, as well as all other applicable privacy, data protection and information security requirements, including U.S. banking safety and security standards. Mastercard is audited for compliance with those banking security standards by U.S. banking regulators on an annual basis. In addition, Mastercard's information security program is audited by an independent third party auditor on an annual basis in accordance with established audit standards (SSAE 16).

Mastercard commits to implement state-of-the-art measures to secure Personal Information. In particular, Mastercard's information security program includes appropriate technical, physical, administrative, and organizational measures and safeguards designed to:

- Ensure the security and confidentiality of Personal Information;
- Protect against anticipated threats or hazards to the security and integrity of Personal Information;
- Protect against any actual or suspected accidental or unlawful destruction, loss, alteration, unauthorized disclosure, acquisition, use or access or any other unlawful forms of Processing of any Personal Information transmitted, stored or otherwise processed.

These measures include the following controls:

- Access controls of persons;
- Data media controls;
- Data memory controls;
- User controls;
- Personal controls;
- Access controls of data;
- Transmission controls;
- Input controls;
- Instructional controls.

For situations where a Mastercard UK BCRs Entity acts as a Data Controller, Mastercard's information security program ensures a level of security appropriate to the risks represented by the Processing and the nature of the data, as well as the state of the art and cost of implementation of those safeguards. Our program is reviewed at least annually to ensure that it is responsive to new and emerging threats to security. Where Sensitive Data is processed, Mastercard implements enhanced security measures as appropriate to the heightened risks of the Processing. We also require our Data Processors or Sub-Processors to maintain strong information security safeguards.

Where we act as Data Processor, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risks presented by the Processing in accordance with the UK GDPR, in particular:

- We and our Sub-Processors assist the Data Controller in ensuring compliance with its obligations under Articles 32 to 36 of the UK GDPR, taking into account the

nature of the Processing and information available.

- We and our Sub-Processors comply with security obligations equivalent to those imposed on the Data Controller by UK Data Protection Law, in accordance with the Mastercard Rules.

In case of a Personal Data Breach involving UK Personal Data, all Mastercard UK BCRs Entities will notify without undue delay Mastercard Europe Services Limited and Mastercard's Data Protection Officer, who will document the Personal Data Breach. We will notify a Personal Data Breach as follows:

- Where the Personal Data Breach is likely to result in a risk to Individuals' rights and freedoms, we will notify the ICO.

- When the Personal Data Breach is likely to result in a high risk to Individuals' rights and freedoms we will also notify Individuals of the Personal Data Breach.

- When we act as a Data Processor, we inform the Data Controller without undue delay after becoming aware of any Personal Data Breach.

9. Onward Transfers

The Mastercard UK BCRs Entities only complete onward transfers to a Data Controller, a Data Processor or a Sub-Processor in compliance with the UK BCRs and the UK GDPR requirements applicable to Data Processors and Data Transfers.

A.Onward Transfers To Data Controllers And Data Processors

The following section applies when Mastercard acts as a Data Controller.

The Mastercard UK BCRs Entities only communicate Personal Information to: (1) another Mastercard Data Controller in compliance with the UK BCRs, including with the transparency requirements and purpose limitation principle; and (2) a non-Mastercard Data Controller located outside of the UK if it complies with UK Data Protection Law and with the legal requirements applicable to data transfers (in particular Articles 45, 46 and 47 of the UK GDPR).

In addition, any Data Processor, including an internal Data Processor (i.e., a Mastercard UK BCRs Entity) and an external Data Processor (i.e., non-Mastercard entity or a Mastercard entity which is not bound by the Mastercard UK BCRs), who may receive or process Personal Information on behalf of a Mastercard UK BCRs Entity is subject to a rigorous due diligence process. The facts gathering and the security aspect of the diligence process is led by Third Party Risk Management (TPRM), in collaboration with the Privacy & Data Protection Team. The findings of the due diligence are reviewed by the Privacy & Data Protection Team to ensure that our Data Processors apply appropriate protections to the data and that Mastercard complies with the legal requirements applicable to Data Processors and data transfers (in particular Articles 28, 29, 32, 45, 46 and 47 of the UK GDPR). The result of the diligence process is documented in a report, which includes any required risk mitigation measures. The process is repeated on an annual basis.
In particular, the Privacy & Data Protection Team ensures that:

- Where a Mastercard UK BCRs Entity uses an internal Data Processor to process Personal Information on its behalf and under its instructions, the Processing takes place in accordance with the UK BCRs.

- Where a Mastercard UK BCRs Entity uses an external Data Processor to process Personal Information on its behalf, the Data Processor is bound by way of a written agreement to comply with data protection obligations in accordance with Article 28 of the UK GDPR, including:

    - Process Personal Information only on behalf of and under the instructions of the Mastercard UK BCRs Entity which acts as the Data Controller;
    - Implement and maintain appropriate technical and organizational measures to protect Personal Information against unauthorized access or disclosure, including by way of a comprehensive written information security program. Having regard to the state of the art and the cost of their implementation, such measures ensure a level of security appropriate to the risks represented by the Processing and the nature of the Personal Information to be protected.
    - Inform the Mastercard UK BCRs Entity if it cannot comply with its data protection obligations, when there is a Personal Data Breach, an information security incident, or when it receives requests from Individuals or from a public authority;
    - Only transfer Personal Information outside of the UK in compliance with Articles 45, 46 and 47 of the UK GDPR;
    - Only sub-contract the Processing of Personal Information with the prior written consent of the Mastercard UK BCRs Entity which acts as the Data Controller and under an agreement that imposes on the Sub-Processor the same data protection obligations as set out in the contract between the Mastercard UK BCRs Entity and the external Data Processor;
    - Ensure that persons authorized to process the Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
    - Assist the Mastercard UK BCRs Entity to ensure compliance with its obligations pertaining to the security of the Personal Information, data protection impact assessments and related prior consultations;
    - At the choice of the Mastercard UK BCRs Entity, delete or return the Personal Information, to the Mastercard UK BCRs Entity after the end of the provision of the services;
    - Make available to the Mastercard UK BCRs Entity information necessary to demonstrate compliance with its obligations under the agreement and inform the Mastercard UK BCRs Entity if, in its opinion, an instruction infringes UK Data Protection Law;
    - Remain liable to the Data Controller for the performance of the Data Processor's obligations.

B. Onward Transfers To Sub-Processors

The following section applies when Mastercard acts as a Data Processor.

The Mastercard UK BCRs Entities only use internal Sub-Processors (i.e., a Mastercard UK BCRs Entity) or external Sub-Processors (non-Mastercard entities) in accordance with the Data Controller's instructions and the informed general or specific authorization provided in the Mastercard Rules or the specific data processing agreement between the Data Controller and the Mastercard UK BCRs Entity.

When we use external Sub-Processors, we bind them via a written agreement to ensure that they comply with the same obligations as are imposed by the Mastercard UK BCRs on Mastercard, via the Mastercard Rules or the specific agreement between the Data Controller and the Mastercard UK BCRs Entity acting as Data Processor.

When the Data Controller gives a general authorization to the Mastercard UK BCRs Entity to use Sub-Processors, the Mastercard UK BCRs Entity commits to provide the Data Controller with a list of Sub-Processors and to inform the Data Controller of any addition or replacement of a Sub-Processor in a timely fashion so as to give the Data Controller an opportunity to object to the change or to terminate the contract before the Personal Information is communicated to the new Sub-Processor, except where the service cannot be provided without the involvement of a specific Sub-Processor.

In addition, Mastercard complies with the following requirements when sub-processing Personal Information:

- Our internal Sub-Processors are bound to respect our UK BCRs and only process Personal Information in line with the instructions of the Data Controllers which are specified in the Mastercard Rules or in a specific agreement.

- The Privacy & Data Protection Team ensures that Mastercard UK BCRs Entities only use Sub-Processors when appropriate data protection guarantees are implemented in accordance with Articles 28, 29, 32, 45, 46, 47 of the UK GDPR, in compliance with the Data Controller's instructions and prior authorization and the requirements outlined above for agreements with external Data Processors.

10. Accountability

Where we act as Data Controller, we implement appropriate technical and organizational measures to ensure and to be able to demonstrate compliance with the UK BCRs, in particular:

- We carry out data protection impact assessments for Processing operations that are likely to result in a high risk to the rights and freedoms of Individuals and consult the ICO, where required under UK Data Protection Law.

- We implement appropriate technical and organizational measures designed to implement data protection principles and to facilitate compliance with the requirements set up by the UK BCRs (data protection by design and by default).

When we act as a Data Processor:

- We make available to the Data Controller information necessary to demonstrate compliance with its obligations and allow for and contribute to audits as provided in our UK BCRs.

- We inform the Data Controller if, in our opinion, an instruction infringes UK Data Protection Law.

- We assist the Data Controller in implementing appropriate technical and organizational measures to comply with data protection principles and facilitate compliance with the requirements set up by the UK BCRs, such as data protection by design and by default.

Whether we act as a Data Controller or a Data Processor, we maintain records of Processing activities and make it available to the ICO upon request.

V. How Do We Ensure Privacy Compliance?

The Privacy & Data Protection Team is responsible to ensure compliance with the UK BCRs requirements under senior executive oversight. Mastercard has a global team of dedicated privacy, data protection and security professionals responsible for administering our privacy and data protection programs.

Mastercard provides regular privacy and data protection training and awareness to Mastercard Staff globally, and all Mastercard Staff are required to comply with Mastercard's data protection policies and procedures. Mastercard's privacy and data protection program is subject to regular internal and external reviews and audits.

1. The Mastercard Privacy & Data Protection Team

The Privacy & Data Protection Team is in charge of ensuring compliance with the UK BCRs requirement and is led by Mastercard's Chief Privacy Officer who is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

Mastercard ensures that the Privacy & Data Protection Team has enough human and financial resources to complete its tasks efficiently and in accordance with UK Data Protection Law. In particular, the Privacy & Data Protection Team is composed of a network of qualified data professionals as well as privacy and data protection lawyers devoting 100% of their time to privacy and data protection law. They are located in Mastercard main offices worldwide, including in the U.S., Belgium, the UK and Singapore. Senior privacy & data protection lawyers are in charge of supervising and coordinating compliance with applicable data protection rules globally. They report to Mastercard's Chief Privacy Officer and are assisted by mid-level and junior privacy and data protection lawyers. The exact structure of the Privacy & Data Protection Team is subject to change as Mastercard business evolves rapidly. An organigram of the Privacy & Data Protection Team is available upon request.

The Privacy & Data Protection Team is responsible for ensuring that the Processing of Personal Information by the Mastercard UK BCRs Entities is legally compliant, as well as ethical. Accordingly, the team is responsible for:

- Supervising and implementing the UK BCRs;
- Ensuring compliance with the requirements of the UK BCRs;
- Updating the UK BCRs in compliance with internal governance procedures;
- Handling requests and complaints of Individuals, in relation to the UK BCRs.

2. Senior Executive Oversight

Mastercard's commitment to privacy starts at the highest levels of the organization, with our Board of Directors, Chief Executive Officer, General Counsel, Executive Vice President Chief Data Officer, Executive Vice President Chief Privacy Officer and our Executive Vice President Chief Security Officer. Mastercard's Chief Privacy Officer is an

Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

3. Data Protection Officer

Mastercard has appointed a Data Protection Officer ("DPO"), who monitors compliance with the UK BCRs and is responsible for the following tasks:

- Informing and advising Mastercard and Mastercard Staff in all matters related to the Processing of Personal Information and their obligations under UK Data Protection Law;
- Monitoring compliance with UK Data Protection Law and Mastercard's policies, including the assignment of responsibilities, awareness-raising and training of Mastercard Staff involved with the Processing of Personal Information and related audits;
- Providing advice regarding data protection impact assessments upon request;
- Acting as a contact point for Individuals in relation to all issues related to the Processing of their Personal Information and to the exercise of their rights under UK Data Protection Law;
- Cooperating with the ICO, for which he or she may act as a contact point.

The DPO has been provided with the necessary resources to carry out his or her tasks. He or she enjoys the highest management support for the fulfilment of these tasks and does not receive instructions in this regard.

4. Privacy and Information Security Officers

The Privacy & Data Protection Team is supported in certain jurisdictions by data protection lawyers and information security officers. In addition, we have appointed Business Unit Records Management Champions globally, who sit in a variety of business and support functions, and who promote employee awareness about data protection, records retention and these UK BCRs. The Privacy & Data Protection Team also works closely with multiple teams around the globe, including the Corporate Security Team as well as the Information Incident Response and Records Retention teams, to ensure that our privacy and data protection program and these UK BCRs are effectively implemented.

5. Training & Awareness

Mastercard UK BCR Entities provide appropriate training on the UK BCRs to Mastercard Staff who have permanent or regular access to Personal Information, who are involved in the Processing of Personal Information or are involved in the development of tools used to Process Personal Information.

Mastercard's Privacy & Data Protection Team provides Mastercard Staff with engaging, relevant and up-to-date training about a variety of privacy and data-related topics, including Mastercard's policies and procedures as well as these UK BCRs. Mastercard's privacy training program is designed to provide Mastercard Staff with the knowledge, tools and resources they need to protect Personal Information and is tailored according to role, function, and access to Personal Information.

All Mastercard Staff are required to take a mandatory data protection course and the completion

of the course is audited. Specialized training modules are also provided for Mastercard Staff in specific roles, functions or in specific jurisdictions. We use interactive methods to deliver training including videos, webcast programs, live fora and social activities to stress the importance of data protection and the role of our UK BCRs to all Mastercard Staff.

6. Control & Audit

Mastercard commits to conduct data protection audits on a regular basis or on specific request from the Privacy & Data Protection Team.

Mastercard commits to take the following actions to control compliance with UK Data Protection Law, including all the requirements of the UK BCRs, by:

- Carrying out audits for compliance on a regular basis both internally and by appointing external auditors where needed and upon request;

- Designating the internal audit team as the department responsible for carrying out internal audits every 3 years or more frequently, as appropriate, and the internal audit team and the Privacy & Data Protection Team as the department responsible to design the scope of each audit of the UK BCRs based on a risk-based approach and in relation to the particular risks presented at the time of the audit (such as the category of data processed and their sensitivity);

- Communicating the results of the audit to the internal audit team, the Data Protection Officer, the Privacy & Data Protection Team and the Mastercard Board;

- Ensuring that corrective actions take place based on the results of the audit;

- Providing customers with the result of the audit report upon request and under the strictest confidentiality obligations;

- Allowing the ICO to audit any Mastercard UK BCR Entity with UK Data Protection Law and the UK BCRs in accordance with UK law;

- Providing the ICO, with the result of the audit report upon request, and allowing the ICO to conduct an audit if and as authorized under UK law. The ICO will exercise its rights in full compliance with its confidentiality duties provided by UK law. In exceptional circumstances, Mastercard and the ICO may agree to limit the range of the concerned information and the means of communication, and to implement any additional restrictions necessary to avoid creating risks for the security, integrity and confidentiality of Mastercard's payment network and of the global financial system; and

- Cooperating with the ICO with regard to any questions relating to the Processing of Personal Information by the Mastercard UK BCR Entities.

None of the above confidentiality requirements should limit the ICO's ability to issue enforcement notice, in compliance with UK law, where corrective action arising from the audit is ignored.

Where we act as Data Processor and subject to the strictest confidentiality obligations, we allow the Data Controller to request an audit of our data protection compliance program by external independent auditors, which are jointly selected by Mastercard and the Data Controller. The external independent auditor cannot be a competitor of Mastercard. Mastercard and the Data Controller will mutually agree upon the scope, timing, and

duration of the audit. Mastercard will make available to the Data Controller the result of the audit of its data protection compliance program. The Data Controller must reimburse Mastercard for all expenses and costs for such an audit. In addition to the above, if the Data Controller requesting the audit is a competitor of Mastercard, Mastercard will be entitled, in cooperation with the jointly selected external auditor, to redact any commercially sensitive and confidential information from the audit report.

In addition, we bind our external Sub-Processors to: (1) provide Mastercard with the necessary information to help us verify the Sub-Processor's compliance with its data protection obligations; and (2) where necessary allow Mastercard to perform or order an on-site audit of the procedures relevant to the protection of Personal Information on behalf of our customers, acting as Data Controllers.

VI. Liability

1. Responsibility Of Mastercard UK BCR Entities

The Mastercard UK BCRs are enforced by all Mastercard UK BCRs entities in accordance with an Intra-Group Agreement. Each Mastercard UK BCRs Entity is responsible for complying with the UK BCRs.

In addition to the individual responsibility of Mastercard UK BCRs Entities, Mastercard Europe Services Limited accepts responsibility and agrees to:

- Take the necessary action to remedy breaches of these UK BCRs caused by other Mastercard UK BCRs Entities located outside of the UK, and contractual breaches caused by Data Processors or Sub-Processors located outside of the UK.

- Pay compensation for any material or non-material damages incurred as a result of such breaches by a Mastercard UK BCRs Entity, a Data Processor or a Sub-Processor, unless Mastercard Europe Services Limited can demonstrate that the damage could not be attributed to a Mastercard UK BCRs Entity, a Data Processor and a Sub-Processor.

Mastercard Europe Services Limited confirms that it has sufficient assets to pay compensation for damages resulting from the breach of the UK BCRs.

2. Third Party Beneficiary Rights

In situations where Mastercard acts as a Data Controller, Individuals have the right to enforce the UK BCRs as third-party beneficiaries, including:

- The data protection principles and Individual's rights (Section IV);

- The right to complain through the internal complaint mechanism (Section VIII.1);

- The right to lodge a complaint with the ICO and to seek judicial remedies and to claim compensation in Courts (Section VIII.2);

- The process for handling conflicts of law (Section IX);

- The duty to cooperate with the ICO (Section VIII.3);

- This section on liability.

Therefore, if a Mastercard UK BCRs Entity violates the UK BCRs, the Courts of England and Wales, Scotland and Northern Ireland and the ICO will have jurisdiction and Individuals will have the rights and remedies against Mastercard Europe Services Limited as if Mastercard Europe Services Limited had committed the violation in the country in which Individuals are located (instead of the country of the Mastercard UK BCRs Entity located outside of the UK).

When we act as Data Processor on behalf of customers, customers believing that our UK BCRs are not complied with have the right to enforce the UK BCRs against any Mastercard UK BCRs entity, including Mastercard Europe Services Limited, for breaches they caused and the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the UK BCRs caused by internal or external Sub-Processors. Moreover, customers have the right to enforce the UK BCRs against Mastercard Europe Services Limited for breach of the UK BCR or of the data processing agreement by internal or external Sub-Processors.

In addition, in situations where Mastercard acts as a Data Processor, Individuals have the right to enforce the UK BCR as third-party beneficiaries directly against Mastercard where:

- The requirements at stake are specifically directed to Data Processors in accordance with the UK GDPR, in particular the duty to (i) respect the instructions received from the Data Controller, (ii) implement appropriate technical and organizational security measures, (iii) notify any Personal Data Breach to the Data Controller, (iv) respect the conditions to engage a Sub-Processor, (v) cooperate with and assist the Data Controller in complying and demonstrating compliance with the law, (vi) provide easy access to UK BCRs, (vii) grant a right to complain through an internal complaint mechanism,
  (viii) cooperate with the ICO; as well as requirements pertaining to (xi) liability, compensation and jurisdiction and (x) conflicts of law.

- They are not able to bring a claim against the Data Controller because the Data Controller has factually disappeared or ceased to exist in law or has become insolvent, unless any successor has assumed the entire legal obligations of the Data Controller by contract of by operation of law, in which case the Individuals can enforce their rights against such entity. In those situations, Individuals have the right to enforce Sections II, IV.1, IV.10, VI, VIII.1, VIII.3 and IX and Appendix 1 of the UK BCRs against Mastercard Transaction Services (UK) Ltd.

In the above scenarios, Individuals are entitled to:

- Lodge a complaint before the ICO and take action against Mastercard before the Courts of England and Wales, Scotland and Northern Ireland.

- Obtain compensation and to remedy breaches of the UK BCRs. Where Mastercard, acting as a Data Controller or a Data Processor, and another third party involved in the same Processing are found responsible for any damage caused by such Processing, Individuals are entitled to receive compensation for the entire damage directly from Mastercard and the other third party involved in the Processing.

- Obtain a copy of the public version of the UK BCRs, including its appendixes, and a copy of the Intra-Group Agreement (without any sensitive and confidential commercial information).

3. Burden Of Proof

Where Individuals or customers bring a claim or proceeding for a violation of the Mastercard UK BCRs and can demonstrate that they have suffered damage and establish facts which show that it is likely that the damage occurred because of a violation of the Mastercard UK BCRs or contractual breaches caused by Data Processors or Sub-Processors located outside of the UK, Mastercard Europe Services Limited is responsible for proving that the Mastercard UK BCRs Entity outside of the UK, the external Data Processors and Sub-Processor were not responsible for the violation giving rise to that damage or that no violation occurred. Where Mastercard Europe Services Limited is successful in proving that the Mastercard UK BCRs Entity outside of the UK, the Data Processor and the Sub-Processor are not responsible for the violation, Mastercard Europe Services Limited may discharge itself from any responsibility.

VII. Updates To The UK BCRs

We may update our UK BCRs to reflect, for example, changes in our Personal Information practices, modifications of the regulatory environment or our company structure.

We commit to report any changes to our UK BCRs without undue delay to all Mastercard UK BCRs Entities and to the ICO as described herein, and where necessary, we will seek a new approval of the UK BCRs. However, we may update the UK BCRs, including the list of Mastercard Entities bound by the UK BCRs, without re-applying for an approval.

In addition to the above, where we act as Data Processor, we commit to comply with the following requirements:

1. Where a change affects the processing conditions, we'll inform the Data Controller in a timely fashion so as to allow the Data Controller the opportunity to object to the change or to terminate the contract before the modification is made.

VIII. How Can You Lodge A Complaint And Enforce The UK BCRs?

1. Internal Complaint Handling

We have implemented internal policies, processes and procedures to allow Individuals to exercise their rights and to manage complaints regarding our Personal Information practices, and these are overseen by the Privacy & Data Protection Team, Mastercard's top management and the Data Protection Officer.

In situations where Mastercard acts as a Data Controller:

- If an Individual or a customer has reasons to believe that a Mastercard UK BCRs Entity has not complied with the UK BCRs, they can lodge a complaint with the ICO, the Courts of England and Wales, Scotland and Northern Ireland, or directly with Mastercard.

- To lodge a complaint with Mastercard, Individuals can proceed in the following ways:
    - E-mail us at: privacyanddataprotection@mastercard.com. by including the term "UK BCRs" in the subject line; or
    - Write to us at: Privacy & Data Protection Team, Mastercard Europe SA,

Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium.

- All complaints are handled by our Privacy & Data Protection Team, assisted by the Data Protection Officer, as follows:
    - We review the complaint and send an acknowledgement of receipt within ten (10) working days.
    - We then investigate the complaint and respond to it as soon as possible and within one month of receipt.
    - If the complaint is particularly complex, or given the number of complaints, Mastercard will provide an estimate of when the response will be provided to the complainant and in any event the response will be provided within three months of the receipt and will explain why it needs extra-time.
- If the complaint is upheld, Mastercard UK BCRs Entities take appropriate remedial measures as necessary to resolve the complaint and ensure compliance with the UK BCRs as appropriate.
- If an Individual is not satisfied with the response from the Privacy & Data Protection Team, that Individual can lodge a complaint with the ICO or lodge a claim with the Courts of England and Wales, Scotland and Northern Ireland.

Where we act as Data Processor, we strongly encourage Individuals to first seek to contact the relevant Data Controller. If we receive a complaint directly from an Individual, our Privacy & Data Protection Team will review the complaint and will forward it to the relevant Data Controller, unless the Data Controller has ceased to exist or became insolvent in which case the complaint is handled by Mastercard as described above.

2. Redress for Individuals

In addition to the internal complaint described above, Individuals can seek redress by: (1) lodging a complaint with the ICO; and (2) seeking a judicial remedy or claiming compensation in court. Individuals are free to lodge a complaint with the ICO, seek a judicial remedy or claim compensation in court regardless of whether they have first lodged a complaint with Mastercard.

To ensure the best possible cooperation and efficiency in relation to complaints, it is preferable that Individuals exercise their rights before the ICO or the Courts of England and Wales. However, this does not preclude them from their right to enforce the UK BCRs before the courts of the Individual's country of residence. When we act as Data Processor on behalf of customers, customers who believe that our UK BCRs are not complied with have the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the UK BCRs caused by internal or external Sub-Processors.

3. Duty of Cooperation

Mastercard UK BCR Entities will cooperate with requests, queries or complaints from Individuals, Data Controllers and the ICO. Mastercard UK BCR Entities will follow the recommendations of the ICO regarding the implementation of the UK BCRs.

IX. How Do We Handle Potential Conflicts Of Law?

Where Applicable Law is likely to prevent a Mastercard UK BCRs Entity from fulfilling its obligations under these UK BCRs and where complying with such Applicable Law is likely to have a substantial adverse effect on the guarantees provided by these UK BCRs, the matter is referred to the Privacy & Data Protection Team for resolution, and as required under UK law, to the ICO. Our Privacy & Data Protection Team reviews each matter on a case-by-case basis and documents it internally.

If we receive an access request for Personal Information by a law enforcement authority or state security body ("requesting agency"), the Privacy & Data Protection Team responds to the enquiry by informing the requesting agency about our limited data set. We also refer the requesting agency to the appropriate financial institution, which holds more comprehensive information about the relevant cardholder.

Where the requesting agency pursues the request, we ensure that it follows the required legal process for its country and jurisdiction, including any applicable privacy safeguards. If there is a question about the legitimacy or scope of the request, we challenge it. Only when we are satisfied that the legal process is valid and appropriate, and when we are convinced that the request does not prevent a Mastercard UK BCRs Entity from fulfilling its obligations under these UK BCRs and does not have a substantial effect on the guarantees provided by them, do we deliver the narrowest possible set of data required to be responsive to the request while ensuring data minimization.

If we do not manage to resolve the conflict of laws, the Privacy & Data Protection Team will use its best efforts to put the access request on hold for a reasonable delay in order to consult with the ICO on how to resolve it, unless otherwise prohibited by Applicable Law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation.

Transfers of Personal Data, which are not massive, disproportionate, indiscriminate and do not go beyond what is necessary in a democratic society on the basis of one of the interests listed in Article 23 of the UK GDPR are in principle not in contradiction with Mastercard UK BCRs and thus do not require consultation with the ICO. However, in case of doubt, Mastercard will consult with the ICO.

When the suspension and/or notification are prohibited, such as in case of a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation, Mastercard will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible to the ICO, and be able to demonstrate that it did so. If despite having used its best efforts, Mastercard is not in a position to notify the ICO, it will provide general information on the requests (e.g., number of applications for disclosure, type of Personal Information requested, requesting agency if possible) to the ICO on an annual basis.

In addition to the above, where a Mastercard UK BCRs Entity acts as Data Processor, we notify the Data Controller when Applicable Laws prevent the Mastercard UK BCRs Entity (1) from fulfilling its obligations under these UK BCRs and have a substantial adverse effect on the guarantees provided by these UK BCR, and (2) from complying with the instructions received from the Data Controller via the Mastercard Rules or the data processing agreement between Mastercard and the Data Controller. We do not notify Data Controllers if such disclosure is prohibited by Applicable Law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation. The Data Controller is responsible for notifying the ICO if applicable and as authorized under Applicable Law.

Appendix 1 Mastercard Entities Covered By The UK BCRs

Mastercard UK BCR Entities and Mastercard Staff are bound to respect the UK BCRs. At a high-level, Mastercard UK BCRs Entities are structured as follows:

- Mastercard Europe S.A., Waterloo, Belgium is the European headquarters of Mastercard.
- Mastercard International Incorporated is the global headquarters of Mastercard.
- Mastercard Europe Services Limited and all other entities are subsidiaries or affiliates of Mastercard Europe S.A., Waterloo, Belgium or Mastercard International Incorporated.

The following Mastercard UK BCR Entities have signed Mastercard's Intra-group Agreement:

The following list is accurate as of September 2025. For a fully updated list of entities please contact the Privacy & Data Protection Team at Privacyanddataprotection@mastercard.com.

FOR EUROPE:			
Country	**Mastercard UK BCRs Entity**	**Registration number**	**Contact Details**
Armenia	Armenia Representative Office of Mastercard Europe S.A.	264.0 65.13 51254	51 Komitas ave, 51/4, Arabkir district,Yerevan, Armenia 0014, Armenia
Austria	Mastercard Europe S.A. Austria Representative Office	30039 8440/ UID ATU6 42173 78	Wipplingerstraße 30/DG, Vienna 1010, Austria
	IfOnly Austria GmbH	FN 50 1126	Küniglberggasse 7,Vienna 1130, Austria
Azerbaijan	Mastercard Europe SA Azerbaijan Representative Office	1403433041	4/189 Falez Plaza 6th Floor, Nasimi District Hasan Aliyev, Baku City, Azerbaijan AZ1078
Belarus	Mastercard Europe SA Belarus Representative Office	102397251	4-32 Zybitskaya Str., 2nd (second) floor No: 32-1,Minsk, 220030, Belarus
Belgium	Mastercard Europe S.A.,	0448.038.446	Chaussée de Tervuren

			198A B-1410, Waterloo, Belgium
	Belgium Branch (Waterloo) of Maestro International Incorporated	0463.192.915	Chaussee de Tervuren 198A,Waterloo, 1410, Belgium
	Mastercard Jupiter Investments SPRL	0830.805.493	Chaussee de Tervuren 198A,Waterloo, 1410, Belgium
	Mastercard Transaction Services (Europe) SA	549987921	Chaussée de Tervuren 198A,Waterloo 1410, Belgium
Bosnia & Herzegovina	Mastercard Europe S.A., Bosnia & Herzegovina Representative Office	4202169990006	UNITIC Business Centre, Fra Andela Zvizdovica 1,Sarajevo 71000, Bosnia and Herzegowina
Bulgaria	Mastercard Europe S.A. Bulgaria Representative Office	176381804	88 Kniaz Aleksandar Dondukov Blvd, fl. 4, Oborishte Region,Sofia, Bulgaria 1527, Bulgaria
	Sel Int Ltd Bulgaria EOOD	200217365	37A Fridtjof Nansen str, 5th floor, Sredets Region, Sofia 1142, Bulgaria
Croatia	Mastercard Europe S.A. Croatia Branch Office	080867029	Radnička cesta 80/12, Zagreb Tower, Zagreb 10000, Croatia (Local Name: Hrvatska)
Cyprus	Cyprus Rep office of Mastercard Europe SA	AE3516	Hadjikyriakeion Bld 1, 121 Prodromou Avenue, 1st floor, Nicosia 2064, Cyprus
Czech Republic	Mastercard Europe S.A. Czech Republic Branch Office	693 45 724	Palladium, Na Porici 1079/3a, 110 00 Prague 1, Czech Republic
	Session M Czech Republic s.r.o.	077 21 587	Pernerova 697/35, Karlin, 186 00 Prague 8, Czech Republic
Denmark	Mastercard Europe S.A. Denmark Branch Office	37501727	Arne Jacobsens Allé 13, København S,Copenhagen, Denmark 2300
	Mastercard Payment Services Denmark A/S	40695869	Arne Jacobsens Alle 13, Copenhagen S
	Mastercard OB Services Europe A/S	35509006	Arne Jacobsens Allé 13, København S,Copenhagen, Denmark 2300

Finland	Mastercard Europe S.A. Finland Branch Office	2751634-9	Etelaesplanadi 2, 3C/4D Krs. Helsinki, 00130 Finland
France	Mastercard France SAS, France	501573158	112, Avenue Kleber 75784 Paris Cedex 16 France
	France Branch of Mastercard Transaction Services Europe SA	821562360	31 Chemin du Vieux Chene, Meylan 38240, France
Georgia	Mastercard Europe S.A. Georgia Representative Office	404552649	37M Ilia Chavchavadze Avenue, Floor 5, Tbilisi, Georgia
Germany	Mastercard Europe S.A. Germany Representative Office	006 412 000	Taunusanlage 9-10, Frankfurt am Main 60329, Germany
	Dynamic Yield GmbH	HRB 115651	Taunusanlage 9-10,Frankfurt am Main, 60329, Germany
Greece	Mastercard Europe Greece Single Member S.A.	156214201000	Vasilissis Sofias Avenue No 23, Athens 10674, Greece
Hungary	Mastercard Magyarország Korlátolt Felelősségű Társaság	01-09-383338	Vaci ut 20-26, Westend Business Center,Budapest, 1132, Hungary
	Ekata Global Hungary Kft	01-09-171264	Vaci ut 20-26, Westend Business Center,Budapest, 1132, Hungary
Ireland	Ethoca Limited	412289	Mountain View, Central Park, Dublin 18, Dublin, Ireland
	Ethoca Nominees Limited	557283	Mountain View, Central Park, Dublin 18, Dublin, Ireland
	Mastercard Ireland Limited	499963	One South County, South County Business Park,Dublin 18, Ireland D18 E3HR, Ireland
	Truata (Management) Limited	627068	One South County, South County Business Park, Dublin 18, E3HR, Ireland

	Truata Holdings Limited	622419	One South County, South County Business Park, Leopardstown, Dublin 18, E3HR, Ireland
	Truata Limited	622418	One South County, South County Business Park, Leopardstown, Dublin 18, E3HR, Ireland
Israel	Mastercard Israel Subsidiary Ltd.	515837888	Aluf Kalman Magen 3, Tel Aviv, 6107075 Israel
	Finsec Lab Ltd.	516105624	Aluf Kalman Magen St. 3, Tel Aviv-Yafo 6107075, Israel
	Dynamic Yield Ltd.	51-474336-8	Abba Hillel Silver Rd 21, One Tower, 35th Floor, Ramat Gan 5252213, Israel
Italy	Mastercard Europe S.A. Italy Branch Office	97091560587	Piazza del Popolo 18, 1st Floor Roma, Italy - 00187
Kazakhstan	Mastercard Europe S.A. Kazakhstan Representative Office	120542010604	n.p.8a, 77/7 Al-Farabi Avenue, 050040 (A15E3H4), Almaty, 050040, Kazakhstan
Latvia	SIA Dynamic Yield	40203360276	Duntes iela 6, Rīga LV-1013, Latvia
Lebanon	Mastercard Europe S.A. Lebanon Representative Office	2975	Beirut Souks 1479/Al Marfa'a, Bloc M 4th Floor, Beirut, Lebanon
Moldova	Mastercard Europe SA Waterloo Sucursala Chisinau	1022600054060	Alexandru cel Bun str, 49,Chisinau, Moldova MD-2012, Moldova, Republic Of
Netherlands	Netherlands Branch of Mastercard Europe SA	50304348	Prins Hendrikkade 48,Amsterdam, Netherlands 1012AC, Netherlands
	Ekata Global - Netherlands B.V.	74096397	Prins Hendrikkade 48, 1012AC Amsterdam, The Netherlands
Norway	Mastercard Europe S.A. Norway Branch Office	816 220 122	Regus Posthuset, Biskop Gunnerus gate 14a,Oslo 0185, Norway

	Mastercard Payment Services Infrastructure (Norway) AS	922988862	Haavard Martinsens vei 51, Oslo 0978, Norway
	Mastercard Payment Services Norway AS	822988822	Haavard Martinsens vei 51, Oslo 0978, Norway
Poland	Mastercard Europe S.A. Poland Branch Office, Poland	0000345959	Warsaw Spire, 30th Floor, Plac Europejski 1,Warsaw 00-844, Poland
	Mastercard Processing S.A.	0000316035	Dominikanska, 02-738, Warsaw, Poland
Portugal	Mastercard Europe S.A. Portugal Representative Office	980276500	Avenida Da Liberdade 110, 1, Lisbon Portugal
Romania	Mastercard Europe SA Waterloo Sucursala Bucuresti	38645357	America House Building; 2nd Floor;, Western Wing;, Nicolae Titulescu st. no. 4-8; Sector 1, Bucharest 011141, Romania
Russia	Mastercard Europe S.A. Russia Representative Office	NAN 2015001113 4 TIN 9909085720	Tsvetnoy boulevard, 2, Moscow, 127051, Russia
	Mastercard OOO	1107746323 926	10 Bolshaya Dmitrovka St., Building 4, Moscow, Russia
Serbia	Mastercard Europe S.A., Serbia Representative Office	29026866	Milutina Milankovića 1ž, Entrance B, 5th floor, Belgrade, 11070, Serbia
Slovenia	Mastercard Europe S.A., Slovenia Branch	7203543000	Dimičeva ulica 013,Ljubljana 1000, Slovenia
Slovak Republic	Slovak Republic Branch Office of Mastercard Europe SA	54864658	Pribinova 34, Brastislava 811 09, Slovakia (Slovak Republic)
Spain	Mastercard Europe S.A. Spain Branch Office	W0171837H	Paseo de la Castellana, 259 C, 11ª Torre Cristal / 28046 Madrid, Spain
	Mastercard Spain Holdings, Sociedad Limitada	M569558 Book 31651/90	Avenida de Concha Espina 39B, Madrid,28016, Spain
Sweden	Mastercard Sweden Services AB	559089	Kungsgatan 33, 4th Floor SE-111 56 Stockholm, Sweden
	Minna Technologies Inc.	6029481	Entreprenörsgatan

			Coworking, St Eriksgatan 6, 411 05, Göteborg, Sweden,
	Minna Technologies AB	556-967-5449	Entreprenörsgatan Coworking, St Eriksgatan 6, 411 05, Göteborg, Sweden,
	Scriby AB	556938-0339	Entreprenörsgatan Coworking, St Eriksgatan 6, 411 05, Göteborg, Sweden,
	Baffin Bay Networks AB	559035-6183	Kungsgatan 33, 4tr, 111 56, Stockholm Sweden
Switzerland	Mastercard Europe S.A. Switzerland Branch Office	CHE-110.335.313	Löwenstrasse 25 8001 Zürich
Turkey	Mastercard Europe S.A., Turkey Representative Office	3810044245	Tamburi Ali Efendi Sok., No: 1334337 Etiler – Istanbul
Ukraine	Mastercard Europe S.A., Ukraine Representative Office	266004 63	17/52 Bogdana Khmelnitskogo street, floor 4 A, office 404 A, Kiev, 01030, Ukraine
UK	Mastercard Prepaid Management Services Limited	054297 39	Access House, Cygnet Road Hampton, Peterborough,
	Mastercard Payment Gateway Services Limited	03430157	10 Upper Bank Street London, E14 5NP United Kingdom
	Mastercard Payment Gateway Services Group Limited	03168091	19th Floor, 10 Upper Bank Street, London, E14 5NP, United Kingdom
	Mastercard UK Management Services Ltd, UK	4617367	7th Floor, 1 Angel Lane, London EC4R 3AB, United Kingdom
	Vocalink Holdings Limited	06119036	1, Angel Lane, 9th Floor, London EC4R 3AB, United Kingdom
	Vocalink Limited	06119048	1 Angel Lane, London, EC4R 3AB, United Kingdom
	Vocalink International Limited	11646063	1, Angel Lane, 9th Floor, LONDON, United Kingdom EC4R 3AB, United Kingdom
	Voca Ltd	01023742	Drake House, Three Rivers Court, Homestead Road, Rickmansworth,

			Hertfordshire, WD3 1FX, United Kingdom
	Voca Pension Trustees Ltd	09655475	Drake House, Three Rivers Court, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
	Vocalink Interchange Network Ltd	03565766	1 Angel Lane,London, United Kingdom EC4R 3AB, United Kingdom
	Vocalink Retail Services Ltd	02094831	1 Angel Lane,London, United Kingdom EC4R 3AB, United Kingdom
	Mastercard OB Services UK Limited	12507991	1 Angel Lane, London, EC4R 3AB, United Kingdom
	Mastercard Transaction Services (UK) Ltd.	07031967	1 Angel Lane, LondonEC4R 3AB, United Kingdom
	CATSEC 401 Ltd	02999731	1 Angel Lane, London, United Kingdom EC4R 3AB, United Kingdom
	CEL Int, Ltd UK	06678417	1 Angel Lane, London EC4R 3AB, United Kingdom
	Global Mastercard Holdings LP	LP16352	10 Upper Bank Street, London, El4 5NP, United Kingdom
	IPco 2012 Ltd	08330583	1, Angel Lane, London, EC4R 3AB, United Kingdom
	Mastercard Europe Services Limited	09210818	7th Floor, 1 Angel Lane, London EC4R 3AB, United Kingdom
	Mastercard Holdings LP	LP16341	10 Upper Bank Street, Canary Wharf, London England
	Mastercard UK Holdco Limited	10255459	1 Angel Lane, London, EC4R 3AB, United Kingdom
	Mastercard/Europay U.K. Limited	2398979	7th Floor, 1 Angel Lane, London EC4R 3AB, United Kingdom
	Traina Interactive LTD	11033652	7 Albemarle Street,

			London W1S 4HQ, United Kingdom
	Truata (UK) Limited	13111385	1 Angel Lane, London, EC4R 3AB, United Kingdom
	Minna Technologies Ltd	12359568	1 Chapel Street, Warwick, CV34 4HL, United Kingdom
FOR NORTH AMERICA:			
Country	**Mastercard UK BCRs Entity**	**Registration number**	**Contact Details**
Canada	Mastercard Technologies Canada ULC	1146475	475 Howe Street, Vancouver, British Columbia V63 2B3,
	Ethoca LLC	4723423	4211 Yonge Street, Suite 202, Toronto, Ontario M2P 2A9, Canada
	Ethoca Technologies Inc.	2087762	100 Sheppard Ave. East, Suite 605, Toronto, ON M2N 6N5, Canada
	Mastercard Canada ULC	823401195B C0001	28 – 19628 55a Avenue, Langley, British Columbia V3A 3X2, Canada
	MC MAPLE ACQUISITION ULC	BC1199328	PO Box 49290, 1000-595 Burrard Street, Vancouver, British Columbia V7X IS8, Canada
	Mastercard Transaction Services (Canada) Inc.	1688924	121 Bloor Street East, Suite No. 600,Toronto, Ontario M4W 3M5, Canada
	Mastercard Canada Open Finance Solutions ULC	BC1379514	2600 - 1066 West Hastings Street, Vancouver, British Columbia V6E 3X1, Canada
	Mastercard Vocalink Canada Limited	BC1321670	28 – 19628 55a Avenue, Langley, British Columbia V3A 3X2, Canada
United States	Mastercard International Incorporated	648928	2000 Purchase Street, Purchase, New York 10577-

			2509, United States
	Mastercard Technologies, LLC	3457984	2200 MasterCard Boulevard 63368-7263 O'Fallon, Mo U.S.A.
	Mastercard International Services, Inc.	3454605	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Maestro International Incorporated	2364231	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC	3736123	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC Europe	4332162	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC APMEA	4332163	2000 Purchase Street, Purchase, New York 10577, United States
	Orbiscom Inc.	3162153	2000 Purchase Street, Purchase, Harrison, NY 10577-2509 United States
	Mastercard Mobile Transactions Solution, Inc.	59760807	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Travelers Cheque, Inc.	2197420	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Applied Predictive Technologies, Inc.	3146225	4250 N Fairfax Drive; 11th Floor; Arlington, Virginia 22203, United States
	APT Software Holdings, Inc.	4202357	4250 North Fairfax Drive, 11th Floor, Arlington, Virginia, 22203, U.S.A.
	Brighterion, Inc.	3176106	123 Mission Street, Suite 1700,San Francisco, California 94105, United States
	Ekata Inc.	3999312	2000 Purchase Street, Purchase, New York 10577-

			2509, United States
	Eurocard U.S.A., Inc.	0100052091	9 East 46th Street, New York, New York 10017, United States
	Finicity Corporation	4188418	434 West Ascension Way, Suite 200, Salt Lake City, Utah 84123, United States
	Humanity Ventures LLC	6609893	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard A&M Investment Holdings, LLC	5446149	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Africa, Inc.	3229450	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Center for Inclusive Growth, Inc.	5483520	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Colombia Holdings, LLC	5480411	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Investments, LLC	5480412	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Processing, LLC	5480414	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Technologies, LLC	5480415	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia, Inc.	2477931	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Ecuador, Inc.	4565125	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard EMEA, Inc.	2503294	2000 Purchase Street, Purchase, New York 10577-

			2509, United States
	Mastercard Financing Solutions LLC	3692050	2000 Purchase Street, County: Westchester, Purchase, New York 10577-2509, United States
	Mastercard Incorporated	3390142	2000 Purchase Street, County: Westchester, Purchase, New York 10577-2509, United States
	Mastercard Investment Holdings, Inc.	5005370	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Latin America Holdings, Inc.	4888456	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Mercosur, Inc.	2633468	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Middle East, Inc	3546843	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Partners LLC	5635607	2000 Purchase Street, Legal Department, Purchase, New York 10577-2509, United States
	Mastercard Peru, Inc	3157575	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Prepaid Management Services USA, Inc.	4933598	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Puerto Rico, LLC	192	350 Ave Carlos E. Chardon, Suite 225, San Juan, Puerto Rico 00918, United States
	Mastercard UK, Inc.	3245417	10 Upper Bank Street, Canary Wharf, London, United Kingdom, E14 5NP, United Kingdom

	Mastercard US Holdings LLC	5619847	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Venezuela, Inc.	2451848	801 Brickell Avenue, Suite 1300,Miami, Florida 33131, United States
	MTS Holdings, Inc.	2468513	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Purchase Street Holdings, LLC	6985806	2000 Purchase Street, Purchase, New York 10577, United States
	Purchase Street Insurance Services, LLC	4889544	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Purchase Street Reinsurance, Inc.	V750630	400 Cornerstone Drive, Sute 240, Chittenden County, Williston, Vermont 05495, United States
	RiskRecon, Inc.	5807551	434 W Ascension Way, #200, Murray, Utah 84123, United States
	Session M, Inc.	4861126	225 Franklin Street, 9th Floor, Boston, Massachusetts 02210, United States
	Mastercard Transaction Services Corp.	7319857	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Traina Interactive Corp.	5043837	123 Mission Street, Suite 1700,San Francisco, California 94105, United States
	Trans-Fast Remittance, Holding LLC	5428620	Corporation Trust Company, 1209 Orange Street,Wilmington, Delaware 19801, United States
	Mastercard Transaction Services (US) LLC	4238893	150 Fifth Avenue,New York, New York 10011, United States
	Mastercard Transaction Services (California) Inc.	C3655952	150 Fifth Avenue,New York, New York 10011,

			United States
	Arcus Financial Intelligence, Inc.	5126491	2000 Purchase Street, Purchase, New York 10577-2509, United States 2000 Purchase Street,Purchase, New York 10577-2509, United States
	Ciphertrace, Inc.	5817112	140 Victory Lane, Los Gatos, California 95030, United States
	Truata LLC	5847238	2000 Purchase Street, Purchase, New York 10577, United States
	Truaxis, LLC	4353431	959 Skyway Road, Suite 150, San Carlos, California, 94070, United States
	Saul Acquisition Sub LLC	7944740	2000 Purchase Street, Purchase, New York 10577, United States
FOR ASIA PACIFIC:			
Country	**Mastercard UK BCRs Entity**	**Registration number**	**Contact Details**
Australia	Mastercard Loyalty Solutions Australia Pty Ltd	002693656	72 Christie Street, St Leonards NSW 2065, Australia
	APT Australia Pty. Ltd.	603177171	72 Christie Street, St Leonards, NSW 2065, Australia
	Ethoca Australia Branch	ABN: 891 864 66976	100 Harbour Esplanade Docklands, Victoria 3008, Australia
	IfOnly Australia Pty Ltd.	629 248 399	Suite 204, 477 Collins Street,Melbourne, Victoria VIC 3000, Australia
	Mastercard Asia/Pacific (Australia) Pty Ltd	108 603 345	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Holding Pty Ltd	143 337 722	72 Christie Street, St Leonards, NSW 2065, Australia

	Mastercard Australia Pty Ltd	168 732 429	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Prepaid Management Services Australia Pty Ltd	145 452 044	72 Christie Street,St. Leonards, NSW 2065, Australia
	Mastercard Travel Solutions Australia Pty Ltd	003 745 999	72 Christie Street, St Leonards, NSW 2065, Australia
	Plus Points Pty Ltd	101 890 537	72 Christie Street, St Leonards, NSW 2065, Australia
	PPS Loyalty Pty Ltd	129 013 921	72 Christie Street, St Leonards, NSW 2065, Australia
Bangladesh	Bangladesh rep office of Mastercard Transaction Services (US) LLC	03.219.344.00.00.0000.2530.02092019	City Centre, Level-27, Suite # 26 A1-A2, 90/1, Motijheel, C/A, GPO, Dhaka, PO: 1000
	Bangladesh Representative Office of Mastercard Singapore Holding Pte. Ltd.	03.219.344.00.00.0000.2478.24072019	Crystal Place (12th Floor), SE (D) 22, Road #140, Gulshan South Avenue, Gulshan-1,Dhaka, 1212, Bangladesh
Cambodia	Cambodia Representative Office of Mastercard Singapore Holding Pte. Ltd.	1784/2015	Canadia 18th Floors, No. 315,, Aung Doung Street Corner Monivong Blvd, Sangkat Wat Phnom, Khan Daun Penh, Phnom Penh, Cambodia
China	APT Technology Consulting (Shanghai) Co., Ltd.	91310115MA1K3LDL5Q	Unit 1904, No. 8 Central Avenue, Pilot Free Trade Zone, Shanghai, China
	Beijing Branch of Mastercard Information Technology (Shanghai) Co., Ltd	110000450260468	B1207, NO.26, Chaowai Street, Chaoyang District, Beijing, China
	China Branch (Beijing) of Mastercard Shanghai Business Consulting Co., Ltd.	1100004501658 14	Room 501A, 5th Floor, China Resources Building, No. 8 Jianguomenbei Avenue, Dongcheng District, Beijing 10005, China
	China Branch (Guangzhou) of Mastercard Shanghai Business Consulting Co.	4401014000689	Room 2015-16A, CITIC Plaza, No. 233 Tianhe North

	Ltd.	25	Road, Guangzhou, 510613, China
	China Representative Office (Beijing) of Mastercard International Incorporated	91110000X000004579	No. 8 Janguomen Wei Ave., China Resources Building, Room 701-702, Beijing, 100005, China
	Mastercard Information Technology (Shanghai) Co., Ltd.	[2010]0192	No. 68 Middle Yin Cheng Road, Suite 04, Floor 40, One Lujiazui, Pudong New District, Shanghai, China
	Mastercard Netsunion Information Technology (Beijing) Co, Ltd.	91110102MA01HHL193	Room 111, No. 101 Building 3, Beishanhuan Middle Road No. 29,Xicheng District, Beijing, China
	Mastercard Shanghai Business Consulting Ltd.	310000400564516	Room 2907-14, 29/F, Shanghai IFC, 8 Century Avenue, Pudong, Shanghai, 200120, China
	Pudong Branch of Mastercard Information Technology (Shanghai) Co., Ltd	310115500130618	Room 04, 40/F, One Lujiazui | No.68, Middle Yincheng Road, Shanghai, China
Hong Kong	Mastercard Asia/Pacific (Hong Kong) Limited	34668852	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong,
	Mastercard Loyalty Solutions China Limited	50677275	Unit 1402, 14th Floor, Henley Building, No. 5 Queen's Road Central, Hong Kong,
	Mastercard Loyalty Solutions Hong Kong Limited	31708219	Unit 1402, 14th Floor, Henley Building, No. 5 Queen's Road Central, Hong Kong,
	Mastercard Loyalty Solutions International Limited	30784268	Unit 1402, 14th Floor, Henley Building, No. 5 Queen's Road Central, Hong Kong,
	Mastercard Travel Solutions Hong Kong Limited	58059586	Unit 1001, 10/F., Infinitus Plaza, 199 Des Voeux Road,

			Central, Hong Kong,
India	Mastercard India Services Private Limited	U93000HR2012FTC047951	4th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon – 122 002, India
	Mastercard Technology Private Limited, India	U72200PN2000PTC014585	12th Floor, Bluegrass Business Park, Tower 1, Survey no. 102A/1A, Plot 3/3, Pune Nagar Road, Village - Yerwada, Pune, Maharashtra 411006, India
	Mastercard Mobile Transactions Solutions Private Limited	U72200PN2005PTC165613	12th Floor, Bluegrass Business Park, Tower 1, Survey no. 102A/1A, Plot 3/3, Pune Nagar Road, Village - Yerwada, Pune, Maharashtra 411006, India
	Mastercard Loyalty Solutions India Private Limited	U74900MH209PTC190903	602-603, Windfall, Sahar Plaza, J B Nagar, Andheri-Kurla Road Mumbai, Maharashtra, 400 059 India
	India Branch (Gurgaon) of MasterCard Advisors, LLC APMEA	83.050.2012.13	5th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon, Haryana 122002 (PIN, India
	India Rep Office of Mastercard International Incorporated	NDL092000069	11th Floor, Tower D, Global Business Park, M.G. Road, Gurgaon, Haryana, Haryana, New Delhi 122002, India
	Finicity Technologies Private Limited	U72200MH2005PTC154044	1101, Floor 11, Building No. 9, Gigaplex Estate Private Limited, Mindspace, Airoli (W), Navi Mumbai, Thane, Maharastra 400708, India
	Mastercard Switching Services India Private Limited	U74999PN2021FTC203994	12th Floor, Bluegrass Business Park, Tower 1, Survey no.

			102A/1A, Plot 3/3, Pune Nagar Road,Village - Yerwada, Pune, Maharashtra 411006, India
	Mastercard Money Transfer Services India Private Limited	U67190PB1995PTC015897	Lower Ground Floor, Office No. 6, City Square EH-197, Civil Lines, Jalandhar PB, 144001, India
	Mastercard XBS Technologies Private Limited	U67190MH2010FTC206754	10th Floor, The Pavilion, Sneapati Bapat Road, Pune, Maharashta, 411016, India
India	Minna Global Subscription Pvt. Ltd.	U62099KA2023FTC171576	Floor No Ground to 8th, Salarpuria Magnificia, No. 78, Doorvaninagar, Bangalore North, India
Indonesia	PT Mastercard Indonesia	09.05.1.70.680008	Sentral Senayan 1, Lt. 17/117 E, JL., Asia Afrika No. 8, Central Jakarta, Indonesia
Japan	Japan Branch of Mastercard Loyalty Solutions International Limited	708782	Toranomon Hills Mori Tower 8th Floor, 23-1, Toranomon 1-chome,Minato-ku, Tokyo, Japan
	Mastercard Japan K.K.	0110-01-051453	Toranomon Hills Mori Tower 8th Floor, 23-1, Toranomon 1-chome, Minato-ku, Tokyo, Japan
	Mastercard Prepaid Management Services Japan KK	0110-01-069577	Toranomon Hills Mori Tower 8th Floor, 23-1, Toranomon 1-chome, Minato-ku, Tokyo, Japan
	Mastercard Services Japan Limited	0110-03-006898	Toranomon Hills Mori Tower 8th Floor, 23-1, Toranomon 1-chome, Minato-ku, Tokyo, Japan

Malaysia	Malaysia Branch of Mastercard Asia/Pacific Pte. Ltd.	200402000010	Suite 3.1 & 3.2, Level 3, Menara 1 Dutamas, Solaris Dutamas, No 1, Jalan Dutamas 1, Kuala Lumpur 50480, Malaysia
	MASTERCARD TRANSACTION SERVICES (MALAYSIA) SDN. BHD.	1220440-D	Unit 2-7, Level 18 IBP Tower, Dona Julia Vargas Avenue, Ortigas Center, Pasig City, Metro Manila, 1604, Philippines
New Zealand	Mastercard Loyalty Solutions New Zealand Limited	229 8309	Martelli McKegg, Level 20, PwC Tower, 188 Quay Street, Auckland 1010, New Zealand
	Mastercard New Zealand Limited	1893982	Level 20, 188 Quay Street, Auckland, 1010, New Zealand
	Mastercard Prepaid Management Services (NZ) Limited	3261147	Level 3, MasterCard House, 136 Customs Street, West Auckland 1010, New Zealand
Philippines	Mastercard Transaction Services (Philippines) Inc.	182094	Enterprise 1, 28th floor (Penthouse), IBP Tower, Iade Drive, San Antonio, Pasig City, 1605, Philippines
	Mastercard International Philippines, Inc.	2753003	Room 904, Ayala Tower One & Exchange Plaza, Ayala Avenue, Makati City, 1226, Philippines
	Philippines Branch of Mastercard International Philippines, Inc.	A199915970	27/F Unit D, Tower One and Exchange Plaza, Ayala Triangle, Ayala Avenue, Makati City, Manila, Philippines 1226, Philippines
	Philippines Branch of Mastercard Singapore Holding Pte. Ltd.	FS201222408	27/F Unit D Tower One & Exg Plaza Ayala Triangle, Ayala Avenue,Makati, 1226, Philippines

Singapore	Mastercard Asia/Pacific Pte. Ltd, Singapore	199306324E	3 Fraser Street DUO Tower, Level 17, Singapore 189352
	Access Prepaid Singapore Pte. Ltd.	201105746G	12 Marina View, #11-01 Asia Square Tower 2, 018961, Singapore
	Mastercard AP Financing Pte. Ltd.	201731499K	3 Fraser Street, #17-21/28, Duo Tower, 189352, Singapore
	Mastercard Labs Kenya Holdings Pte. Ltd.	201431144W	3 Fraser Street, DUO Tower 17-21/28,189352, Singapore
	Mastercard Loyalty Solutions Singapore Pte. Ltd.	199302957W	Changi Business Park Central, 2 #01-02 Hansapoint, 486030, Singapore
	Mastercard Singapore Holding Pte. Ltd.	201008183D	3 Fraser Street, DUO Tower #17-21/28, 189352, Singapore
	Mastercard VocaLink Asia Pacific Pte. Ltd.	201927008N	3 Fraser street, #17-21/28, Duo Tower, Singapore
	Mastercard Transaction Services (Singapore) Pte. Ltd.	201700267K	3 Fraser Street #17-, Duo Tower, Singapore 189352, Singapore
	Ekata Global - Singapore Pte. Ltd	201942960H	3 Fraser Street, DUO Tower, #17-21/28, 189352, Singapore
	Dynamic Yield APAC Pte. Ltd.	201702196R	12 Marina View, #11-01, Asia Square Tower 2, 018961, Singapore
South Korea	Mastercard International Korea Ltd.	113023	16F, Seoul Finance Center, 136 Sejongdaero Junggu, Seoul, 100-768, Republic of Korea
Sri Lanka	Sri Lanka Rep Office of Mastercard Singapore Holding Pte. Ltd.	1263	Regus 26, East Tower, World Trade Centre, Echelon Square, Colombo, Sri Lanka

Taiwan	Taiwan Branch of Applied Predictive Technologies, Inc.	2899-4556	42F., NO.68, SEC. 5, ZHONGXIAO E. RD., XINYI DIST., TAIPEI CITY,11065, Taiwan
	Taiwan Branch of Mastercard Singapore Holding Pte. Ltd.	28987963	42 F, No. 68, Sec. 5, Zhongxiao E. Road, Zinyi District, 110, Taiwan
Thailand	Mastercard (Thailand) Limited	105 558 076 584	1 Q House Lumpini Building, 16th Floor, Unit 1601, South Sathorn Road, Khwaeng Thungmahamek, Khet Sathorn, Bangkok, Thailand
	Thailand Branch of Mastercard Asia/Pacific Pte. Ltd.	Tor/17/3-199/2547	Q House Lumpini Building Unit 1601, 16th Fl, 1 South Sathorn Road, Kwaeng Thungmahamek, Khet Sathron, Bangkok, 10120, Thailand
Uzbekistan	Uzbekistan Rep office of Mastercard Europe SA	207358484	7, Mustakillik street,, Mirzo-Ulugbek District, 100000,,Tashkent, Uzbekistan
Vietnam	Vietnam Representative Office of Mastercard Asia/Pacific Pte. Ltd.	License No. 113/GP-NHNN	Ho Chi Minh City, Viet Nam
FOR MIDDLE EAST & AFRICA:			
Country	**Mastercard UK BCRs Entity**	**Registration number**	**Contact Details**
Bahrain	Bahrain Representative Office of Mastercard Singapore Holding Pte. Ltd	103106-1	904, 001 Building, 365 Street, 316 Block, Manama Center, Bahrain
Cote D'Ivoire	Cote d'Ivoire, Abidjan, Rep Office of Mastercard Singapore Holding Pte Ltd	CI-ABJ-2017-B-6983	c/o Regus Abidjan, XL Plateau Centre, 6 floor, Unit 602, Corner of Dr. Crozet St., and Boulevard de la Republique, Plateau 01 BP 2785,

			Abidjan, Cote D'Ivoire
Egypt	Mastercard Egypt LLC	1976	Nile City Towers, North Tower, 16th Floor, 2005C Corniche El Nil, Cairo, Egypt 11221, Egypt
Ghana	Mastercard Ghana Limited	CS155212020	5TH FLOOR VIVO PLACE, CANTONMENTS, Rangoon St; P. O. BOX MB 595,Accra, Ghana
Jordan	Mastercard Asia/Pacific Pte. Limited/Jordan	44389	Business Park Development Zone/Amman, 26 Temp, 2 Alkursi, Gh 02, Third Floor - Office No. 3, Amman, Jordan
Kenya	Mastercard East Africa Limited	CPR/2011/55650	LR No. 1870/V/72, Sanlam Towers, 4th Floor, Waiyaki way, P.O. Box 2194-00606, Nairobi, Kenya
	Mastercard Labs Kenya Limited	CPR/2015/174295	L.R. No 91/438, Ground Floor, Eaton Place, United Nations Crescent, Girigi, Nairobi, P.O. Box 2194-00606, Kenya
Mauritius	Mastercard (Mauritius) Limited	190279	5th Floor Ebene Esplanade, 24 Bank Street, Cybercity, Ebene, Mauritius
Morocco	Morocco Branch of Mastercard Africa, Inc.	147505	Tour Crystal 1, 12th Floor, Boulevard Sidi Mohammed Ben Abdellah, Quartier Casablanca Marina, Casablanca,20030, Morocco

Myanmar	Mastercard Myanmar Limited	127160295	No. 112-114, 1st Floor, Bogalay Zay Street, Botahtaung Township, Yangon, Myanmar
Nigeria	Mastercard Services Sub-Saharan Africa Limited	RC 1384603	7th Floor, Alliance Place, 33A Alfred Rewane Road, Ikoyi, Lagos, Nigeria
	Mastercard West Africa Limited	RC 889080	7th floor, Alliance place, 33A, Alfred Rewane road,Ikoyi, Lagos, Nigeria
	NYBER Nigeria Limited	1055739	Flat 3, block 34 Maryland Housing Estate, Maryland, Lagos State, Nigeria
	Trans-Fast Remittances Ltd.	1382856	Block 34, Maryland Housing Estate, Maryland Ikeja, Lagos Nigeria
Pakistan	Mastercard Pakistan (Private) Limited	0098089	Care of M/s Surridge & Beecheno, 3rd Floor, Finlay House, I.I. Chundrigar Road, Karachi, Pakistan
	Pakistan Liaison office of Mastercard Transaction Services (US) LLC	114021	112 & 113, 1 Floor, Bahria Complex-III, M.T., Khan road, Karachi, Pakistan
Qatar	Mastercard Gulf LLC	QFC No. 00160	Al Fardan Office Tower, Office No. 2, 16th Floor, AlFardan Office Towers, West Bay,
Saudi Arabia	Saudi Arabia Branch of Mastercard Middle East, Inc.	1010192854	King Fahad Road, Al-Olaya Dist. Hamad Tower, Unit 301, P.O. Box 66749, Riyadh, 12212, Saudi Arabia
	Saudi Arabia Branch of Mastercard Transaction Services (US) LLC	1010949495	Suite 442, 4th Floor, Regus Hamad Tower, King Fahd Branch Rd, Al Olaya, Riyadh, 12212, Saudi Arabia

Senegal	Mastercard Dakar Bureau de Representation	201008183D	SIA Building, 1st Floor, Route de Ngor, Les Almadies, Dakar Senegal
	Mastercard Transaction Services (Senegal) SAU	SN-DKR-2009-B-20224	Route de Ngor, Les Almadies 1st Floor SIA Building,Dakar, Senegal 10200, Senegal
South Africa	Mastercard Southern Africa (Pty) Ltd	2011/006482/07	2nd Floor, 23 Melrose Arch Boulevard, Melrose Arch, JOHANNESBURG, 2196 South Africa
Turkey	Masterpass Ödeme Hizmetleri Anonim Şirketi	1026961	ESENTEPE MAH. 23 TEMMUZ SK. NO: 2/1 Ic KAPI NO: 1, Instabul, Turkey
Uganda	Orion Payment Solutions Limited	80034479903090	4TH FLOOR RWENZORI TOWERS, PLOT 6 NAKASERO ROAD,KAMPALA, Uganda, Uganda
United Arab Emirates	Mastercard Middle East Africa FZ-LLC	20564	FL1-Offices, 1 st Floor, Building MasterCard, Dubai, United Arab Emirates, United Arab Emirates
	Mastercard Transaction Services FZ-LLC	20624	FL1-FL2-FL3, Mastercard Building, Al Falak Street, P.O. Box 502093,Dubai, United Arab Emirates
Zimbabwe	Mastercard Zimbabwe (Private) Limited	13377/2019	1st Floor, Suite L, Sam Lavy's Village, Corner Piers & Borrowdale Road, Borrowdale, Harare, Zimbabwe, Zimbabwe
FOR LATIN AMERICA			
Country	**Mastercard UK BCRs Entity**	**Registration number**	**Contact Details**

Argentina	Argentina Branch of Mastercard Mercosur, Inc	30-689904390	Olga Cossettini, #771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
	Mastercard Cono Sur S.R.L.	1776014	Edificio Porteno 1, Olga Cossenttini 771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
	Latarg Holding S.R.L.	30717183467	Maipú 1300, 11th Floor, Buenos Aires, Argentina
Brazil	Access Prepaid Brasil Servicos de Cartoes S.A.	35.300.389.859	Bernadino de Campos 318, 6° andar, Brooklin, Sao Paulo, CEP 04621-0, Brazil
	Brasil Branch of Mastercard Brasil Solucoes de Pagamento Ltda.	05.577.343/0002-18	SH/SUL Quadra 06, Conjunto A, Bloco 6, Sala 611, Centro Empresarial Brasil 21, Brasilia, 70.316-000, Brazil
	Mastercard Brasil Ltda.	CNPJ/MF 01.248.201/0001/75	Centro Empresarial Nacoes Unidas, Av. Das Nacoes Unidas 14.171, 20th Andar, Torre C - Crystal Tower 0479-000, Brazil
	Mastercard Brasil Participacoes Ltda.	23.529.362/0001-70	Avenida das Nações Unidas, 14.171, Crystal Tower, 19º andar, São Paulo 04794-000, Brazil
	Mastercard Brasil Soluções de Pagamento Ltda.	São Paulo Junta Comercial 150179/03-0	Condomínio Rochaverá, Av. Das Nacoes Unidas 14.171. 20th Andar, Torre C - Crystal Tower, Sao Paulo 04794-000, Brazil
	Zargoje Participações Ltda.	21.793.694/0001-31	Naçoes Unidas Av., 14.171, 20o floor, Crystal Tower, São Paulo/SP, 04794-000, Brazil

	Truata Privacy Tech Brasil Limitada	42.355.178/0001-03	Rua Dom Jose de Barros, n 177, Conj.801-Parte, 8th Floor, Center,Sao Paulo, Brazil 01.038-901, Brazil
Chile	Chile Representative Office of Mastercard International Incorporated	3998/93	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
	Mastercard International Incorporated Chile Limitada	17658	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
	Mastercard Administradora Chile S.A.	NA	Av. Apoquindo 2929, piso 21, Las Condes,Santiago, Chile 7550246, Chile
Colombia	Colombia Branch of Mastercard Colombia, Inc.	640275	Santa Fe, Bogota, Colombia
	Mastercard Colombia Administradora S.A.	02735104	Carrera 11 No. 84-09 Entrada Norte, Piso 8 Oficina 801, Bogota, Colombia
	Arcus FI S.A.S	901.389.502-4	Carrera 9 # 78-31, 978 Building, Bogota, Colombia
Costa Rica	Mastercard Costa Rica Billing Services S.R.L.	3-102-789914	Sexto Piso De Torre Lexus, Oficina Numero Ae, Sobre La Calle Marginal, De La Ruta Nacional Numero Veintisiete, San Jose-Escazu San Rafael, Costa Rica
	Mastercard Costa Rica, S.R.L	3-102-607815	Torre Lexus, Piso 6, Avenida Escazú, San Rafael de Escazú, San Jose, Costa Rica
Dominican Republic	Mastercard Republica Dominicana, SRL	1-31-36908-1	Rafael Augusto Sanchez No. 86, Torre Empresarial: Roble corporate center, Piso 7, Piantini, Santo Domingo, Dominican Republic
	Optimización de Recursos Regalii Dominicana SRL	123120SD	Victor Garrido Puello No. 148, Distrito Nacional, Dominican Republic

Ecuador	Ecuador Branch of Mastercard Ecuador, Inc.	1792163846001	Av. 6 de Diciembre y Luis Cordero, Edif. Novus, Ofic. 401, Quito Ecuador
Guatemala	Mastercard Guatemala Servicios Limitada		Septima Avenida 5-10, Zona 4, Centro Financiero Torre I, Nivel 16, Ciudad de Guatemala, Guatemala
Jamaica	Jamaica Branch Office of Mastercard Latin America Holdings, Inc.	1943 (Overseas)	Panjam building, Ninth floor, 60 Knutsford boulevard, Kingston 5, Kingston, Jamaica
Mexico	IfOnly Mexico S.A.P. I de CV	551276-1	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, CDMX, Mexico
	Mastercard Mexico Billing Services, S. de R.L. de C.V.	492297	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, Mexico
	Mastercard Mexico, S. de R.L. de C. V.	332409-BIS	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, Mexico
	Mexico Representative Office of Mastercard International Incorporated	N/a	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez,Del Cuauhtémoc, 06600, Mexico
	Arcus F.I. S.A de C.V. Institución de Fondos de Pago Electrónico	N-2018065707	Paseo de la Reforma 250, Torre A, Piso 21-22, Colonia Juarez, Alcaldia Cuauhtemoc, Mexico City CP 06600, Mexico
	Optimización de Recursos Regalii S. de R.L. DE C.V	1296*7	Paseo de la Reforma 250, Torre A, Piso 21-22, Colonia Juarez, Alcaldia Cuauhtemoc, Mexico City CP 06600, Mexico

	Mastercard Transaction Services LAC, S. de R.L. de C.V	N-2017040165	Av. Las Americas 187, 1 Las Americas Morelia, Morelia Michoacan, CP 58270, Mexico
Panama	Mastercard Panama S. de R.L.	929481	Urbanizacion Costa del Este, Avenida a Rotonda, Edificio Prime Time Tower, Piso 6, Corregimiento de Juan Diaz, Panama City, Panama
Paraguay	Mastercard Paraguay S.R.L.	1077	AVENIDA BRASILIA 707, CASI SIRIA, ASUNCIÓN, Paraguay
Peru	Peru Branch of Mastercard Peru, Inc.	11175092	Avenida El Derby 055, Torre 1, 5th Floor, Oficina 501, Edificio Cronos, Santiago de Surco, Lima, 27, Peru
Trinidad And Tobago	Trinidad and Tobago branch of Mastercard Latin America Holdings, Inc.	E2021012003821	2000 Purchase Street, Purchase, New York 10577, United States
Uruguay	Mastercard Uruguay Limitada	22353	Misiones Nro. Puerta 1371, Nro. Ap. 40, Montevideo 11000, Uruguay
Venezuela	Venezuela Branch of Mastercard Spain Holdings, S.L.	221-38685	Calle Madrid entre Trinidad y Mucuchies, Torre Centro Financiero Madrid, piso 9, Urb. Las Mercedes. Municipio Baruta, Caracas, Venezuela
	Venezuela Branch of Mastercard Venezuela, Inc.	16, vol. 57-A-4th	Calle Madrid entre Trinidad y Mucuchies, Torre Centro Financiero Madrid, piso 9, Urb. Las Mercedes. Municipio Baruta, Caracas, Venezuela

The Privacy & Data Protection Team will assess on a case-by-case basis the data transfer practices of any newly acquired companies that have not yet signed Mastercard's Intra-group Agreement and implement appropriate interim data transfer solutions, including contractual guarantees.

Appendix 2 Glossary

Account Servicing Payment Services Provider ('ASPSP') – means the entity that provides a payment account for an Individual and which permit payments initiated by TPPs and/or make the PSU's account transaction data available to TPPs.

Account Information Service – means an online service to provide consolidated information on one or more payment accounts held by an Individual with either another payment service provider or with more than one payment service provider.

Applicable Law – means any laws, ordinances, constitutions, regulations, statutes, treaties, rules, principles of common law or other statutory requirements applicable to Mastercard UK BCRs Entities.

Data Controller – means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Information.

Data Processor – means the natural or legal person, public authority, agency or any other body which processes Personal Information on behalf of and under the instructions of the Data Controller.

Supervisory Authority or SA – means the independent public authority supervising compliance with privacy and data protection legislation.

Employee – means past, present and prospective employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard.

EEA – means the European Economic Area, comprised of the EU Member States plus Iceland, Liechtenstein, Norway, Switzerland and Monaco.

GDPR – means the EU General Data Protection Regulation 2016/679 (as amended and replaced from time to time).

ICO – means the Information Commissioner, which is the Data Protection Authority of the UK.

Individual – means an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law) to whom the Personal Information pertains.

UK BCRs Intra-group Agreement – means the intra-group agreement that binds Mastercard UK BCR Entities to the UK BCRs.

Mastercard – means the Mastercard Group composed of Mastercard International Incorporated, Mastercard Europe SA, their subsidiaries and affiliates.

Mastercard UK BCRs Entity(ies) – means the Mastercard entities that are bound by the UK BCRs and have duly executed the Intra-group Agreement (listed in Appendix 1).

Mastercard Rules – the Rules for the Mastercard, Maestro and Cirrus brands, as available at http://www.mastercard.com/us/merchant/pdf/BM-Entire_Manual_public.pdf.

Mastercard Staff – Employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard and who are bound by the UK BCRs.

Payment Initiation Service - means a service to initiate a payment order at the request of an Individual with respect to a payment account held at another payment service provider.

Personal Data Breach – means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information transmitted, stored or

otherwise processed.

Personal Information – means any information relating to an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law), an identifiable natural or legal person is one who can be identified, directly or indirectly, in particular by reference to an identification number (such as the personal account number) or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Processing – means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Sensitive Data – means any Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data or biometric data processed for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, as well as any other type of data that will be considered to be sensitive according to any future revision of UK Data Protection Law.

Sub-Processor – means the entity engaged by the Data Processor or any further sub-contractor to process Personal Information on behalf of and under the instructions of the Data Controller.

Third Party Provider ('TPP') – means the legal or natural person that provides account initiation services or payment initiation services to an Individual.

UK – means the United Kingdom.

UK Data Protection Law – means: (1) the Data Protection Act 2018; (2) the GDPR as amended by the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and 2020 ('**UK GDPR**') as relevant; and (3) the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC) as transposed into UK national law.

Mastercard KSA Binding Common Rules

Updated in December 2024

External Version

Mastercard KSA Binding Common Rules
External Version

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I. Summary

Mastercard is a technology company in the global payments industry that connects Individuals, financial institutions, merchants, governments, public sector bodies, and businesses worldwide. We facilitate the processing of payment transactions permitting Mastercard cardholders to use their cards and other payment technologies at millions of merchants and allowing Individuals, financial institutions, businesses, public sector bodies and businesses to complete payments among themselves. Our network provides Individuals and businesses with a quick, convenient and secure payment method that is accepted worldwide. Our mission is to make payments safe, simple and smart.

To support that mission Mastercard has established a comprehensive privacy and data protection program. We dedicate significant global resources to ensure compliance with applicable data protection laws and we have embedded privacy and data protection into the design of our products and services.

We take privacy and data protection seriously at Mastercard. We have a dedicated Privacy & Data Protection Team that is led by our Chief Privacy and Data Responsibility Officer who reports to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee who reports to Mastercard's Chief Executive Officer.

Mastercard conducts the following types of data Processing activities:

- **Payment processing.** As a processor of payment transactions, Mastercard obtains and processes Personal information about cardholders and other Individuals from customers (e.g., issuing financial institutions (issuers), acquiring financial institutions (acquirers), merchants, public sector bodies, partners (e.g., digital wallets) and other businesses) to facilitate payment transactions;

- **Fraud prevention and detection.** Mastercard processes Personal information of Individuals to prevent, identify, detect, and protect against any type of fraud;

- **Direct-to-consumer services.** Mastercard collects and processes Personal information of Individuals (e.g., name, email, telephone number, type of payment card) to provide services and programs directly to them or benefitting them, such as loyalty and rewards programs, digital wallets, cardholder services, marketing programs and promotions;

- **Open banking services.** Mastercard provides connectivity services, as a technical service provider, between and on behalf of Account Servicing Payment Service Providers ("ASPSPs") and Third-Party Providers ("TPPs") and Account Information Services and Payment Initiation Services as a TPP, as well as financial analysis services;

- **Customer management.** Mastercard collects and processes Personal information of staff of customers, merchants, suppliers and vendors (e.g., business contact information) to contact them, to manage business relationships and to offer support services; and

- **Employee management.** Mastercard collects and processes Personal information of Employees (e.g., name, salary, benefits, education, work experience), including information about contractors or job applicants. The information is used to manage the employment relationship and job application process.

If you are an Employee, please consult the internal version of Mastercard BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard BCRs apply to the processing of your Personal Data, and some of the sections applicable to our Employees may also apply to the processing of your Personal Data. These sections are only available in the internal version of our BCRs. We will provide you with a copy of our internal Mastercard BCRs upon request if you e-mail us at Privacyanddataprotection@mastercard.com.

For our "core" payment processing activities, Mastercard acts as Data Processor on behalf of our financial institutions, merchants, customers and partners. For other activities such as programs offered directly to Individuals or employment-related activities, Mastercard may act as Data Controller. Mastercard has established a comprehensive privacy and data protection program and applies a holistic approach whether we act as Data Processor or Data Controller.

Mastercard is committed to comply with KSA Personal Data Protection Law.

Mastercard's KSA Binding Common Rules (**"BCRs"**) are part of our privacy and data protection program and are aimed at facilitating the transfer of Personal information to and among Mastercard BCRs entities worldwide in compliance with KSA Personal Data Protection Law. We have implemented internal policies, processes and procedures on data protection, including on data protection by design.

Our BCRs cover data Processing activities where we act either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules specified in our BCRs apply to both types of activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

At Mastercard, Personal information is:

- **Processed fairly and in a transparent manner**
- **Processed only if Mastercard can rely on a valid legal ground**
- **Protected with additional safeguards if it is considered to be Sensitive Information**
- **Adequate, relevant and not excessive, kept accurate and up-to-date**
- **Processed for specified and compatible purposes, and not retained unnecessarily**
- **Processed in accordance with Individuals' rights**
- **Only used for automated processing in compliance with the law**
- **Processed using operational and technical safeguards**
- **Only processed by Processors if adequate protections exist**

Mastercard Arabia for Information Technology ("**MAIT**") 2886, Northern Ring Rd, Al Aqeeq District, Riyadh, Kingdom of Saudi Arabia, is the entity responsible for compliance with the BCRs in KSA. MAIT accepts liability for any breach of the BCRs caused by another Mastercard entity located outside of KSA, including any Data Processor or Sub-Processor used by Mastercard. The data protection authority competent for the supervision of MAIT is the Saudi Data & AI Authority (SDAIA).

All Mastercard BCRs Entities are bound to comply with the BCRs requirements by an Intra-group Agreement. The Privacy & Data Protection Team will ensure compliance with the BCRs under Senior Executive oversight as well as internal and external reviews and audits.

Please refer to **Appendix 1** for details concerning Mastercard entity responsible for the BCRs and other Mastercard Entities.

Individuals have the right to lodge a complaint with the KSA Personal Data Protection Authority if they believe that the BCRs have been breached.

Please refer to Glossary for capitalized terms used in this document.

II. Duty To Respect The BCRs

The BCRs set the standards that Mastercard satisfies when processing Personal information about Individuals either as a Data Controller or as a Data Processor.

Mastercard's BCRs are binding on all Mastercard BCRs Entities and on all Mastercard Staff Processing Personal information as follows:

- The Mastercard BCRs Entities are bound by an Intra-group Agreement to respect the BCRs. The Intra-group Agreement specifies how Mastercard BCRs Entities can enforce the BCRs as well as how can the BCRs be enforced against any Mastercard BCRs Entity for the violation they have caused. The Mastercard Intra-group Agreement is reviewed as necessary to incorporate significant changes. The Mastercard BCRs Entities that are covered by the BCRs and have signed Mastercard's Intra-group Agreement are listed in **Appendix 1**.

- The Mastercard Staff are bound by the BCRs in two ways. First, the Mastercard Staff are required to sign a binding employment contract, which requires employees to comply with the Code of Conduct, all Mastercard policies, and a duty not to disclose or misuse Personal Data. In addition, the Mastercard Staff is required to sign a declaration that they abide by the Code of Conduct and recertify adherence to the Code of Conduct on an annual basis. Adherence to the Code of Conduct requires adherence to all Mastercard's policies, including Mastercard BCRs.

III. What Do Our BCRs Cover?

Mastercard's BCRs apply to all Mastercard BCRs Entities that process Personal information either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules of our BCRs apply to both types of Processing activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

1. Geographical Scope

Our BCRs cover all Processing of Personal Data, which is or was subject to KSA PDPL, and is conducted by Mastercard BCRs Entities worldwide, including the Processing of Personal information that is transferred and processed by a Mastercard BCRs Entity outside of KSA and the Processing of Personal information that was subject to KSA PDPL and is onward transferred from a country outside of KSA. Our BCRs apply to all Mastercard BCRs Entities worldwide; a list of countries where Personal information may be transferred is attached in **Appendix 1**. Each of the transfers that are described in the table in Section III.2 may be carried out to all the countries listed in Appendix 1.

2. Material Scope

Our BCRs cover the Processing of Personal information described in this section.

Mastercard receives most of the data when it processes payment transactions; however, we receive a limited number of Personal information to process these payment transactions. When we process payment transactions, we typically receive the following Personal Data: the personal account number, the merchant name and location, the date, time and the total amount of the transaction. Except as otherwise indicated in the chart below, we do not receive the cardholder's name or other contact information when processing payment transactions. Nor do we receive information about the type of product or service that is purchased.

In addition to our core payment transaction processing activities, we also:

- offer some engagement programs, such as loyalty and rewards programs. To enable such programs, we collect Personal Data, such as the Individual's name and their email address. Individuals are provided with a privacy notice for these programs, which describes the type of Personal information we collect and how we process it. Personal information is collected directly from Individuals or provided by Mastercard customers. We keep the Personal information collected in the context of such programs segregated from Personal information processed for payment processing, unless otherwise specified in the program-specific privacy notice.

- offer debit payment and cheque processing services. When we process Personal information for debit payment and cheque processing services, we may process additional Personal information such as the Individual's name, information that relates to the financial institutions (e.g., sort code), any reference in a free text field, the Individual's signature, and in limited situations other unique identifiers.

- offer fraud prevention and detection services. Mastercard collects and processes Personal information of Individuals, such as IP address, physical address and phone number, to prevent, identify, detect, and protect against any type of fraud. We may share such Personal information with customers as part of our fraud prevention and identity verification services.

- offer open banking services. When we process Personal information either for ASPSPs and TPPs or at the request of business customers or the Individual, we may process additional Personal Data, such as an Individual's bank account details, transaction data, the type of open banking service requested, and other identifiers. Where we act as a Data Controller, Individuals are provided with a privacy notice specific to the open banking services.

In more detail, we process the following categories of Personal Data, depending on the type of services provided, whether we act as a Data Controller or a Data Processor, the purpose of the Processing after the Personal information has been transferred and the categories of Individuals whose Personal information are transferred.

Unless otherwise specified in the table or in other sections of the BCRs, we transfer Personal information on a continuous basis as necessary to support the stated purposes:

Mastercard's Role	Purposes	Types of Personal information and Categories of Individuals
Processor	Authorizing, clearing and settling transactions on behalf of our financial institutions, merchants, customers and partners.	Personal information **of cardholders and other Individuals**, such as: • Card data (e.g., card expiration date, Card Verification Value (CVV) and Card country code). • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant), card expiration date, Card Verification Value, card country code). • Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number, free text reference, Individuals' signature for cheque and other unique identifiers).
Processor	Cross-border and domestic account to account payments on behalf of our financial institutions and corporate customers.	Personal information of **account holders, beneficiaries and other Individuals**, such as: • Data related to fund transfers (e.g., personal account number, associated codes, name and location of the payee). • Contact information (e.g., name, phone number) as well as other information (e.g. date of birth, government ID) when provided by financial institutions and corporate customers.
Processor	Supporting our customers' issuing and acquiring business.	Personal information of **cardholders**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Contact information (e.g., name, postal or email address, phone number) as well as other information (e.g. date of birth, gender, government ID) as/when provided by cardholders (for card

		registration purposes), issuers and acquirers. • Additional information provided by cardholders or merchants (e.g., delivery address, product codes). Personal information of staff at **financial institutions and merchants**, such as: • Contact information (e.g., business email address, business postal address, business telephone number, job title). KSA PDPL applies to Personal information of legal entities or sole proprietors e.g. merchant address, category, business contact information.
Controller or Processor depending on activity	Preventing cardholder disputes and facilitating cardholder dispute resolution and chargeback procedures.	Personal information of **cardholders and other Individuals**, such as: • Data necessary for cardholder dispute resolution (e.g., transaction data, such as personal account number, and date/time/amount/location/currency of the transaction; cardholder contact information; device-related information; merchant details; order details (e.g., items purchased); information about the dispute, and other unique identifiers for payment and cheque processing services).
Controller or Processor depending on activity	Enabling the connectivity, maintenance and operation of our open banking solutions.	Personal information of **Individuals**: • Account and payment data (e.g. transaction data, such as personal account number, date/time/amount/description of the transaction, name and location of the payee), as well as other financial information. • Open banking request and response information (e.g., requests and responses, Account Information Service requests and responses, request reference number, and response status). • Electronic identification data (e.g., username, password, country of residence, security questions, IP address, logs). • Device-related information (e.g., user device IDs).

		Personal information of staff at **ASPSPs, TPPs, financial institutions and customers**, such as: • Contact information (e.g. business email address, business postal address, business telephone number, job title). • Electronic identification data (e.g. username, password, security questions, IP address).
Controller	Accounting, auditing and billing.	Personal information of **staff at financial institutions, merchants, customers and partners**, such as: • Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title). KSA PDPL applies to Personal information of legal entities or sole proprietors e.g. merchant address, category, business contact information.
Controller	Managing customer relationships and financial reporting, including relationships with financial institutions, merchants, customers and partners.	Personal information of **staff at financial institutions, merchants, customers and partners**, such as: • Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title). KSA PDPL applies to Personal information of sole proprietors e.g., merchant address, category, business contact information.
Controller	Managing suppliers and vendors.	Personal information of **staff at suppliers and vendors**, such as: • Contact information of persons at suppliers and vendors (e.g., business email address, business postal address, business telephone number, job title).

Controller or Processor depending on activity	Marketing activities of Mastercard or our customers, including offers, sweepstakes, contests and promotions.	Personal information of **consumers and website users (whether or not cardholders)**, such as: • Contact information (e.g., name, postal or email address, phone number). • Electronic identification data (e.g., username, password, security questions, IP address). • Device-related information (e.g., user device IDs, browser information, online identifiers, user interactions with and preferences on websites and applications). • Data collected in the context of online marketing programs and other promotional activities, such as contests (e.g., personal characteristics, life habits, consumption habits, interests, geo-location data, and voice and image recordings, contest responses).
Controller	Compliance with applicable Laws, regulations and law enforcement requests.	Personal information of **Individuals, cardholders and staff at financial institutions, merchants, customers and partners**, such as: • Data required for legal compliance (e.g., know your customer information for anti-money laundering compliance, responding to Individuals' requests).
Controller	Talent acquisition and Employment-related purposes, such as managing Mastercard's workforce, work planning, training and development, talent management, facilitating communication with and between the workforce, managing emergencies (such as ensuring business continuity and protecting health and	Personal information of prospects, candidates, former and current **Employees and other Mastercard staff**, such as: • Contact information (e.g., name, address, email address and telephone number, date and place of birth, Social Security number or other national identification number). • Payroll data (e.g., banking details, corporate credit card number and transaction details). • Information on an Individual's position (e.g., current position, title, salary plan, pay grade or level, employee ID).

	safety), Human Resources administration (including payroll and compensation management), maintaining a directory of former employees and Prospects.	• Talent management information (e.g., application information, resume/CV, previous employment background, education history). • Applicant data (e.g., current and previous employers, job titles, dates of employment, resume/CV information). • Compensation information (e.g., base salary, bonus, benefits, pay enhancements for dependents, performance appraisals). • Internal reports and compliance information (reports on compliance and disciplinary issues within the organization, including gift logs and, where applicable, whistleblowing reports). • Management records (details of any shares of common stock or directorships).
Controller	Corporate security purposes, such as integration planning and controlling security of premises and logical systems.	• System and application data of **Employees and other staff**, as well as security control data (including any information required to access company systems and applications, information about employees' use of technology resources, and photographs and other visual images, such as CCTV images). • Visitor data (e.g. registration data, CCTV images).
Controller or Processor depending on activity	Fraud prevention and detection, cybersecurity and cyber resilience, authentication, digital identity, financial crime, identity verification and risk management.	Personal information of **cardholders and other Individuals**, such as: • Fraud related payment data (e.g., personal account number, date/time/amount of the transaction, items purchased, name, merchant's details and location). • Biometric data for authentication purposes (e.g., photographs, voice, fingerprint). • Online fraud and authentication data (e.g., IP address, users' details such as name, email address, physical address and phone number, merchants' details and online behaviour). • Cybersecurity and cyber resilience related

		data (e.g., IP addresses, IP header, source/destination port, TCP/UDP headers). • Information gathered from the blockchain (e.g., blockchain address, IP address) and cryptocurrency transaction data (e.g., date/time/amount of the transaction, transaction unique identifier, balance or amount attached to the blockchain address, participating blockchain addresses, and location. • Contact information (e.g., name, address), as well as ID cards, where permitted by and in accordance with applicable law, and reason codes when attributed to sole proprietor merchants. • Device-related information (e.g., users' device IDs, browser information, users' interactions with the device, website and applications). • Financial crime data (e.g., data about money laundering, terrorist financing, bribery, corruption and other unlawful activities) both on traditional rails and cryptocurrency. • Location data. • Fraud score, type of fraudulent activity and confirmed fraudulent activity, validation of identity verification. • Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number and other unique identifiers, free text reference, Individuals' signature for cheques). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners, and data derived from our analysis of such information.

Controller	Internal research, reporting and analysis.	Personal information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Controller or Processor depending on activity	Providing products and services benefiting Individuals, including rewards programs, eWallets, tokenization services, prepaid services and processing donations.	Personal information of **cardholders and other Individuals**, such as: • Loyalty and rewards data (e.g., cardholder name, e-mail address, billing or shipping address, phone number, personal account number, transaction data). • Device-related information (e.g., user device IDs, browser information, online identifiers). • User engagement data (e.g., user interactions with and preferences on websites and applications). • e-Wallet and prepaid registration data, and tokenized payment credentials (e.g., cardholder name, e-mail address, billing or shipping address, phone number, personal account number, card expiration date, card verification code, transaction data). • Biometric data for authentication purposes (e.g., photographs). • Non-biometric data for authentication purposes (e.g., authentication methodology, authentication confirmation). • Client relationship management data and other data that a customer provides in the context of the services (e.g., loyalty status).

Controller or Processor depending on activity	Providing products and services directly to financial institutions, corporate clients, merchants, customers and partners, including statistical reports and tools, prepaid management services and customer service support.	Personal information of **staff at financial institutions, corporate clients, merchants, customers and partners**, such as: • Contact information or identifying details of persons at financial institutions, corporate clients, merchants, customers and partners (including but not limited to business or personal email address, business or personal postal address, business or personal telephone number, job title, date of birth, country of origin, social media accounts and information, IP addresses). KSA PDPL applies to Personal information of legal entities or sole proprietors, e.g. merchant address, category, business contact information. Personal information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Data received for cardholder support (e.g., data received at a call centre) or cardholder services (i.e., data to support emergency card replacement services). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Processor	Providing data analytics products and services to financial institutions, merchants, corporate clients and partners with their instructions.	Personal information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.

Controller	Anonymising data for the purposes of developing and providing data analytics products and services.	Personal information of **cardholders and other Individuals**, such as: • Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant). • Any other information provided by financial institutions, corporate clients, merchants, customers and partners.
Controller	Establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies.	Personal information of **Individuals, cardholders and staff at financial institutions, merchants, customers and partners**, such as: • Data required to establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies.

IV. How Do We Protect Personal Data?

Personal information is key to Mastercard's business activities. For our business to function we must handle Personal information with keen sensitivity to privacy and security standards in order to protect Personal information on behalf of all the members of our global payment network. Our company is committed to the protection of Personal information and to compliance with relevant laws.

Mastercard first and foremost complies with applicable data protection law. The Mastercard BCRs Entities comply with KSA Personal Data Protection principles both when we act as a Data Controller and where we act as a Data Processor. However, where applicable national data protection law requires a higher level of protection for Personal Data, it will take precedence over the BCRs.

- When we act as a Data Controller, we establish processes and procedures to ensure compliance with all requirements of KSA PDPL

- Where we act as a Data Processor, we process Personal information on behalf of the Data Controller and upon its instructions as provided in the Mastercard Rules or in a specific agreement between Mastercard and the Data Controller.

We only transfer Personal information to Mastercard BCRs Entities that are effectively bound by the BCRs and can demonstrate compliance with the requirements set out in these BCRs.

The following describes how we respect the principles of KSA PDPL, including how we cooperate with our customers to ensure respect of those principles:

1. Transparency & Fairness

The Mastercard BCRs Entities provide Individuals with clear information on how we process Personal Data.

Transparency is a key value at Mastercard. We provide Individuals with a number of online and offline privacy notices, including our Global Privacy Notice and program-specific privacy notices. All our privacy notices include, at the minimum, the information required by the KSA PDPL (such as the identity and contact details of the controller and the Data Protection Officer, the purpose(s) of the Processing and related legal grounds, the categories data recipients, and data transfers), and a link to the BCRs.

Our BCRs inform Individuals about:

(i) the data protection principles we apply when processing Personal Data;

(ii) the liability regime applicable to such Processing;

(iii) their third-party beneficiary rights with regard to such Processing and how to exercise those rights.

All Individuals have the right to easily access the BCRs. A public version of the BCRs will be published on Mastercard's public website, and Mastercard BCRs will be available on Mastercard's intranet.

2. Legal Ground For Processing

The Mastercard BCRs Entities only process Personal information if they can rely on one of the limited legal grounds provided by KSA PDPL.

When a Mastercard BCRs Entity acts as a Data Controller, our Privacy & Data Protection Team reviews Personal information Processing operations and ensures that the Processing is based on a legal ground for processing Personal Data, including for example:

- Individuals have unambiguously given their consent to the Processing of Personal Data;
- The Processing serves an actual interest of the Individual and it is impossible or difficult to contact the Individual;
- The Processing is required by a law other than KSA PDPL or is in implementation of an earlier agreement to which the Individual is a party; or
- The Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller, except where this prejudices rights of the Individual or conflicts with the Individual's interests or where the Personal information is Sensitive Data.

Where we act as Data Processor, we process Personal information at the direction of the Data Controller who is responsible for ensuring a valid legal ground for the Processing.

3. Sensitive Data

The Mastercard BCRs Entities only collect Sensitive Data when absolutely necessary for the purpose of the Processing and if they can rely on one of the limited legal grounds provided under KSA PDPL.

Certain categories of Personal information are Sensitive Data and receive a higher level of protection under KSA Personal information Protection Law.

When a Mastercard BCRs Entity acts as a Data Controller, we process Sensitive Data only in limited circumstances, and will not process Sensitive Data unless the Processing is based on a legal ground for processing stated in the KSA PDPL, including consent of an Individual.

4. Data Quality

The Mastercard BCRs Entities comply with the data quality principle.

When a Mastercard BCRs Entity acts as a Data Controller:

- The Mastercard BCRs Entities ensures that Personal information is:
    - Kept up-to-date (data accuracy);
    - Adequate, relevant and not excessive in relation to the purpose for which the information was collected and processed (data minimization);
    - Not retained for longer than is necessary for the purpose(s) for which it was originally collected, unless legislation requires us to maintain it (limited storage periods).
- Our transaction processing system is designed to minimize the amount of Personal information collected and for that purpose relies primarily on the personal account number (and not on other directly identifiable information).
- We have implemented a records retention policy that sets out the appropriate time periods for which the Mastercard BCRs Entities will retain data, including Personal Data, in accordance with Applicable Law.

When a Mastercard BCRs Entity acts as a Data Processor, it will cooperate with and assist the Data Controller to comply with KSA PDPL, in particular it will comply with requests from the Data Controller:

- To update, correct or delete Personal Data, and will inform all Mastercard BCRs Entities to whom the data have been disclosed of the required update, correction or deletion of the Personal Data.
- To delete or anonymize the Personal information as of the date when there is no justification to the retention of the data in an identified format, and will inform all Mastercard BCRs Entities to whom the Personal information have been disclosed of the required deletion or anonymization of the Personal Data.

The Mastercard BCRs Entity acting as a Data Processor will comply with the above requests unless legislation imposed upon the Mastercard BCRs Entity prevents it from returning or destroying all or part of the Personal Data, in which case it will, to the extent permitted by applicable law, protect the confidentiality of the Personal information and will not actively process it anymore.

5. Purpose Limitation

Mastercard BCRs Entities only collect Personal information for specified, explicit and legitimate purposes and do not further process it in a way incompatible with those purposes except where permitted or required by applicable law.

When a Mastercard BCRs Entity acts as a Data Controller, we ensure that Personal information is collected and processed only for specific and legitimate purposes and that it is not further processed in ways incompatible with the purposes of the collection, except where permitted or required by applicable law.

One of the ways Mastercard ensures compliance with this principle is by embedding privacy and data protection standards into the product development lifecycle. As part of our product development process, the Privacy & Data Protection Team reviews the collection and use of Personal information on a case-by-case basis to ensure that the Processing is undertaken for specific and legitimate purposes and is compatible with the purpose for which the personal information was collected. We embed these requirements into our technology wherever feasible to do so.

When a Mastercard BCRs Entity acts as a Data Processor, we comply with the following requirements:

- We only process Personal information on behalf of the Data Controller and in compliance with its instructions, including with regard to transfers of Personal information to a third country. If a Mastercard BCRs Entity cannot comply with the Data Controller's instructions, it will inform promptly the Data Controller of its inability to comply, if possible before the Processing takes place, and unless a law prohibits such notice. Once the Data Controller is notified, it is entitled to suspend the transfer of Personal information and/or terminate the contract.

- We take steps to return, destroy or fully anonymize the Personal information of our customers, acting as Data Controllers, on the termination of the provision of services related to the data Processing, unless otherwise legally permitted to continue processing the data (in which case we will only process the data to the strict extent permitted by Applicable Law).

- We fully cooperate with our customers to assist them in their role as Data Controllers to fulfil their data protection compliance obligations in accordance with KSA PDPL.

- When we use our Sub-Processors, including internal Sub-Processors, we make sure they process the Personal information in line with the instructions of our customers acting as Data Controllers. We also identify any Sub-Processors to whom the Personal information will be disclosed.

6. Rights Of Individuals

The Mastercard BCRs Entities comply with Individuals' requests to exercise their rights under KSA PDPL.

When a Mastercard BCRs Entity acts as a Data Controller, subject to and to the extent permissible under applicable law, we ensure that Individuals can exercise their right to:

- Access and request copies of Personal information relating to them and receive the Personal information in a clear, readable and commonly used electronic format (and the Individual may request a printed hard copy format if feasible);

- Obtain rectification, completion, updating or erasure of Personal information relating to them or restriction of the Processing and to be informed of any changes made following such a request;

- Opt-out to the Processing of their Personal information for the purpose of direct

marketing.

Where we act as Data Processor, we require our customers to develop and implement appropriate procedures for handling Individuals' requests exercising their rights to access, rectify, or erase their Personal Data. We do not reply to Individuals' requests to exercise their rights unless authorized or required to do so by our customers, but instead transmit them to our customers. We cooperate and support our customers in responding to such Individuals' requests, and have implemented technical and organizational measures for that purpose.

7. Processing Personal Data based on newly adopted technologies or making decisions based on automated Personal Data Processing

The Mastercard BCRs Entities comply with the requirements applicable to new technologies or automated decisions making under KSA PDPL.

When a Mastercard BCRs Entity acts as a Data Controller and makes automated decisions based on Personal Data, it complies with the requirements applicable to such automated decision-making set out in the KSA PDPL.

8. Data Security

The Mastercard BCRs Entities implement appropriate technical and organizational measures to protect Personal Data.

Information security is at the heart of Mastercard's business model. Mastercard continuously innovates to make electronic payments even more secure. We have introduced chip and pin technology and more recently the digitization and tokenization of payment cards on electronic devices. Mastercard and its peers developed the industry standard for the protection of payment card data (Payment Card Industry PCI data security standards) that is used globally by all parties involved in processing card transactions, including financial institutions and merchants.

Mastercard has implemented and commits to maintain a comprehensive written information security program that complies with KSA Data Protection Law, as well as all other applicable privacy, data protection and information security requirements, including U.S. banking safety and security standards. Mastercard is audited for compliance with those banking security standards by U.S. banking regulators on an annual basis. In addition, Mastercard's information security program is audited by an independent third-party auditor on an annual basis in accordance with established audit standards (SSAE 16).

Mastercard commits to implement state-of-the-art measures to secure Personal Data. In particular, Mastercard's information security program includes appropriate technical, physical, administrative, and organizational measures and safeguards designed to:

- Ensure the security and confidentiality of Personal Data;
- Protect against anticipated threats or hazards to the security and integrity of Personal Data;
- Protect against any actual or suspected accidental or unlawful destruction, loss, alteration, unauthorized disclosure, acquisition, use or access or any other unlawful forms of Processing of any Personal information transmitted, stored or otherwise processed.

These measures include the following controls:

- Access controls of persons;
- Data media controls;
- Data memory controls;
- User controls;
- Personal controls;
- Access controls of data;
- Transmission controls;
- Input controls;
- Instructional controls.

For situations where a Mastercard BCRs Entity acts as a Data Controller, Mastercard's information security program ensures a level of security appropriate to the risks represented by the Processing and the nature of the data, as well as the state of the art and cost of implementation of those safeguards. Our program is reviewed at least annually to ensure that it is responsive to new and emerging threats to security. Where Sensitive Data is processed, Mastercard implements enhanced security measures as appropriate to the heightened risks of the Processing. We also require our Data Processors or Sub-Processors to maintain strong information security safeguards.

Where we act as Data Processor, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risks presented by the Processing.

In case of Personal data breach impacting citizens and residents of KSA, all Mastercard BCRs Entities will notify without undue delay MAIT and Mastercard's KSA Data Protection Officer, who will document the Personal data breach. We will notify a Personal data breach as follows:

- Where the Personal data breach potentially result in a risk or harm to Personal Data, or to the Individual or conflicts with the Individuals' rights or interests, we will notify the competent Data Protection Authority.
- When the Personal data breach may cause damage to Individuals' data or conflict with Individuals' rights or interests, we will also notify Individuals of the Personal information breach.
- When we act as a Data Processor, we inform the Data Controller without undue delay after becoming aware of any Personal data Breach.

9. Onward Transfers

The Mastercard BCRs Entities only complete onward transfers to a Data Controller, a Data Processor or a Sub-Processor in compliance with the BCRs and the KSA PDPL requirements applicable to Data Processors and Data Transfers.

A. Onward Transfers To Data Controllers And Data Processors

The following section applies when Mastercard acts as a Data Controller.

The Mastercard BCRs Entities only communicate Personal information to: (1) another Mastercard Data Controller in compliance with the BCRs and the KSA PDPL and with the legal requirements applicable to data transfers, including with the transparency requirements and purpose limitation principle; and (2) a non-Mastercard Data Controller located outside of KSA if it complies with KSA PDPL and with the legal requirements applicable to data transfers.

In addition, any Data Processor, including an internal Data Processor (i.e., a Mastercard BCRs Entity) and an external Data Processor (i.e., non-Mastercard entity or a Mastercard entity which is not bound by the Mastercard BCRs), who may receive or process Personal information on behalf of a Mastercard BCRs Entity is subject to a rigorous due diligence process. The facts gathering and the security aspect of the diligence process is led by Third Party Risk Management (TPRM), in collaboration with the Privacy & Data Protection Team. The findings of the due diligence are reviewed by the Privacy & Data Protection Team to ensure that our Data Processors apply appropriate protections to the data and that Mastercard complies with the legal requirements applicable to Data Processors and data transfers. The result of the diligence process is documented in a report, which includes any required risk mitigation measures. The process is repeated on an annual basis.

In particular, the Privacy & Data Protection Team ensures that:

- Where a Mastercard BCRs Entity uses an internal Data Processor to process Personal information on its behalf and under its instructions, the Processing takes place in accordance with the BCRs.

- Where a Mastercard BCRs Entity uses an external Data Processor to process Personal information on its behalf, the external Data Processor is bound by way of a written agreement to comply with data protection obligations in accordance with the KSA PDPL (including Article 8 of the KSA PDPL and Article 17 of the Implementing Regulation of the KSA PDPL), including:

    - The purpose of the Processing, the categories of Personal information being Processed and the duration of the Processing;

    - Process Personal information only on behalf of and under the instructions of the Mastercard BCRs Entity which acts as the Data Controller;

    - Implement and maintain appropriate technical and organizational measures to protect Personal information against unauthorized access or disclosure, including by way of a comprehensive written information security program. Having regard to the state of the art and the cost of their implementation, such measures ensure a level of security appropriate to the risks represented by the Processing and the nature of the Personal information to be protected;

    - Inform the Mastercard BCRs Entity without undue delay if it cannot or does not comply with its data protection obligations or any applicable laws in KSA, when there is a Personal information Breach (and in accordance with KSA PDPL), an information security incident, or when it receives requests from Individuals or from a public authority;

- Only transfer Personal information outside of KSA in compliance with the KSA PDPL;
- Only sub-contract the Processing of Personal Information with the prior written consent of the Mastercard BCRs Entity which acts as the Data Controller and under an agreement that imposes on the Sub-Processor the same data protection obligations as set out in the contract between the Mastercard BCRs Entity and the Data Processor;
- Ensure that persons authorized to process the Personal information have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Assist the Mastercard BCRs Entity to ensure compliance with its obligations pertaining to the security of the Personal Data, data protection impact assessments and related prior consultations;
- At the choice of the Mastercard BCRs Entity, delete or return the Personal information to the Mastercard BCRs Entity after the end of the provision of the services;
- Make available to the Mastercard BCRs Entity information necessary to demonstrate compliance with its obligations under the agreement and inform the Mastercard BCRs Entity if, in its opinion, an instruction infringes KSA PDPL;
- Remain liable to the Data Controller for the performance of the external Data Processor's obligations;
- Not requiring any Individual's prior consent for mandatory disclosure of Personal information under applicable laws in KSA, provided that the Data Processor notifies the Data Controller of such disclosure;
- Clarification of whether the Data Processor is subject to regulations in other countries and the impact on their compliance with the KSA PDPL.

B. Onward Transfers To Sub-Processors

The following section applies when Mastercard acts as a Data Processor.

The Mastercard BCRs Entities only use internal Sub-Processors (i.e., a Mastercard BCRs Entity) or external Sub-Processors (non-Mastercard entities) in accordance with the Data Controller's instructions and the informed general or specific authorization provided in the Mastercard Rules or the specific data processing agreement between the Data Controller and the Mastercard BCRs Entity.

When we use external Sub-Processors, we bind them via a written agreement to ensure that they comply with the same obligations as are imposed by the Mastercard BCRs on Mastercard, via the Mastercard Rules or the specific agreement between the Data Controller and the Mastercard BCRs Entity acting as Data Processor.

When the Data Controller gives a general authorization to the Mastercard BCRs Entity to use Sub-Processors, the Mastercard BCRs Entity commits to provide the Data Controller with a list of Sub-Processors and to inform the Data Controller of any addition or replacement of a Sub-Processor in a timely fashion so as to give the Data Controller an opportunity to object to the change or to terminate the contract before the Personal information is communicated to the new Sub-Processor, except where the service cannot be provided without the involvement of a specific Sub-Processor.

In addition, Mastercard complies with the following requirements when sub-processing Personal Data:

- Our internal Sub-Processors are bound to respect our BCRs and only process Personal information in line with the instructions of the Data Controllers which are specified in the Mastercard Rules or in a specific agreement.

- The Privacy & Data Protection Team ensures that Mastercard BCRs Entities only use Sub-Processors when appropriate data protection guarantees are implemented in accordance with Article 17(5) of the Implementing Regulation of the Data Protection Law, in compliance with the Data Controller's instructions and prior authorization and the requirements outlined above for agreements with external Data Processors with the Data Controller's instructions and prior authorization and the requirements outlined above for agreements with external Data Processors.

10. Accountability

Where we act as Data Controller, we implement appropriate technical and organizational measures to ensure and to be able to demonstrate compliance with the BCRs, in particular:

- We carry out and document (1) data protection impact assessments and (2) data transfer impact assessments in accordance with requirements listed in the KSA PDPL and in line with internal processes implementing privacy by design principles for Processing operations where required under KSA PDPL, including the provision of a product or service that involves Processing of Personal information that is likely to result in a high risk or serious harm to the privacy of Individuals.

- We implement appropriate technical and organizational measures designed to implement data protection principles and to facilitate compliance with the requirements set up by the BCRs (data protection by design and by default).

When we act as a Data Processor:

- We make available to the Data Controller information necessary to demonstrate compliance with its obligations and allow for and contribute to audits as provided in our BCRs.

- We inform the Data Controller if, in our opinion, an instruction infringes KSA PDPL.

- We assist the Data Controller in implementing appropriate technical and organizational measures to comply with data protection principles and facilitate compliance with the requirements set up by the BCRs, such as data protection by design and by default.

Whether we act as a Data Controller or a Data Processor, we maintain and as necessary update a record of Processing activities and make it available to the relevant DPA upon request.

- The records we maintain as a Data Controller contain the following information: (i) the name of the controller; (ii) purposes of the Processing; (iii) a description of the categories of Individuals and of Personal Data; (iv) categories of recipients; (v) transfers of Personal Data; (vi) where possible, the envisaged time limits for erasure of the different categories of Personal Data; and where possible, (vii) a general description of the technical and organizational security measures.

- The records that we maintain as a Data Processor contain the following information: (i) the name of the processor; (ii) the categories of Processing carried out on behalf of the controller; (iii) transfers of Personal Information; and where possible (iv) a general description of the technical and organizational security measures.

V. How Do We Ensure Privacy Compliance?

The Privacy & Data Protection Team is responsible to ensure compliance with the BCRs requirements under senior executive oversight. Mastercard has a global team of dedicated privacy, data protection and security professionals responsible for administering our privacy and data protection programs.

Mastercard provides regular privacy and data protection training and awareness to Mastercard Staff globally, and all Mastercard Staff are required to comply with Mastercard's data protection policies and procedures. Mastercard's privacy and data protection program is subject to regular internal and external reviews and audits.

1. The Mastercard Privacy & Data Protection Team

The Privacy & Data Protection Team oversees ensuring compliance with the BCRs requirement and is led by Mastercard's Chief Privacy and Data Responsibility Officer who is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

Mastercard ensures that the Privacy & Data Protection Team has enough human and financial resources to complete its tasks efficiently and in accordance with KSA PDPL. In particular, the Privacy & Data Protection Team is composed of a network of qualified data professionals as well as privacy and data protection lawyers devoting 100% of their time to privacy and data protection law. They are located in Mastercard main offices worldwide. Senior privacy & data protection lawyers are in charge of supervising and coordinating compliance with applicable data protection rules globally. They report to Mastercard's Chief Privacy and Data Responsibility Officer and are assisted by mid-level and junior privacy and data protection lawyers. The exact structure of the Privacy & Data Protection Team is subject to change as Mastercard business evolves rapidly. An organogram of the Privacy & Data Protection Team is available upon request.

The Privacy & Data Protection Team is responsible for ensuring that the Processing of Personal information by the Mastercard BCRs Entities is legally compliant, as well as ethical. Accordingly, the team is responsible for:

- Supervising and implementing the BCRs;

- Ensuring compliance with the requirements of the BCRs;

- Updating the BCRs in compliance with internal governance procedures;

- Handling requests and complaints of Individuals in relation to the BCRs.

2. Senior Executive Oversight

Mastercard's commitment to privacy starts at the highest levels of the organization, with our Board of Directors, Chief Executive Officer, General Counsel, Executive Vice President Chief Data Officer, Executive Vice President Chief Privacy and Data Responsibility Officer and our Executive Vice President Chief Security Officer. Mastercard's Chief Privacy and Data Responsibility Officer is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

3. Data Protection Officer

Mastercard shall appoint a Data Protection Officer (**"DPO"**), who monitors compliance with the BCRs and is responsible for the following tasks:

- Informing, providing support and advice to Mastercard Staff in all matters related to the Processing of Personal information and their obligations under KSA PDPL including contributing to developing policies and internal procedures related to Personal information protection;

- Monitoring compliance with KSA PDPL and Mastercard's policies and procedures, including the assignment of responsibilities, awareness-raising and training of Mastercard Staff involved with the Processing of Personal information and related audits;

- Contributing to reviewing plans of response to Personal data breach incidents, and ensuring that such plans are adequate and effective;

- Cooperating with KSA DPA, and implementing its decisions and instructions regarding the application of the provisions of the KSA PDPL and following up on documents issued by the KSA DPA related to the protection of personal data, including any amendments, and inform the relevant departments to ensure compliance;

- Preparing periodic reports regarding activities related to processing of Personal Data, and providing recommendations to ensure compliance with KSA PDPL.

4. Business Security Officers and Records Management Champions

The Privacy & Data Protection Team is supported in certain jurisdictions by business security officers. In addition, we have appointed Business Unit Records Management Champions globally, who sit in a variety of business and support functions, and who promote employee awareness about data protection, records retention and these BCRs. The Privacy & Data Protection Team also works closely with multiple teams around the globe, including the Corporate Security Team as well as the Information Incident Response and Records Retention teams, to ensure that our privacy and data protection program and these BCRs are effectively implemented.

5. Training & Awareness

Mastercard BCR Entities provide appropriate training on the BCRs to Mastercard Staff who

have permanent or regular access to Personal Data, who are involved in the Processing of Personal information or are involved in the development of tools used to Process Personal Data.

Mastercard's Privacy & Data Protection Team provides Mastercard Staff with engaging, relevant and up-to-date training about a variety of privacy and data-related topics, including Mastercard's policies and procedures as well as these BCRs. Mastercard's privacy training program is designed to provide Mastercard Staff with the knowledge, tools and resources they need to protect Personal information and is tailored according to role, function, and access to Personal Data.

All Mastercard Staff are required to take a mandatory data protection course and the completion of the course is audited. Specialized training modules are also provided for Mastercard Staff in specific roles, functions or in specific jurisdictions. We use interactive methods to deliver training including videos, webcast programs, live fora and social activities to stress the importance of data protection and the role of our BCRs to all Mastercard Staff.

6. Control & Audit

Mastercard commits to conduct data protection audits on a regular basis and if there are indications of non-compliance with the BCRs. Specific audits may be requested by the Privacy & Data Protection Team, or any other competent function within Mastercard. Our audit program covers all aspects of the BCRs and specifies the audit method(s) applied and steps that are taken to ensure remediation where necessary.

Mastercard commits to take the following actions to monitor compliance with KSA PDPL, including all the requirements of the BCRs, by:

- Carrying out audits for compliance on a regular basis both internally and by appointing external auditors where needed and upon request;

- Designating the internal audit team as the department responsible for carrying out internal audit, and the internal audit team and the Privacy & Data Protection Team as the department responsible to design the scope of each audit of the BCRs based on a risk-based approach and in relation to the particular risks presented at the time of the audit;

- Communicating the results of the audit to the internal audit team, the Data Protection Officer, the Privacy & Data Protection Team and the Mastercard Board;

- Ensuring that corrective actions take place based on the results of the audit;

- Providing the KSA DPA with the result of the audit report upon request and under the strictest confidentiality obligations;

- Allowing the KSA DPA to verify compliance of any Mastercard BCRs Entity with KSA PDPL and the BCRs in accordance with applicable law, in particular in respect of the highest confidentiality requirements, and without creating risks for the security, integrity and confidentiality of Mastercard's payment network and of the global financial system; and

- Cooperating with KSA DPA with regard to any questions relating to the Processing of Personal information that is subject to KSA PDPL, by the Mastercard BCRs Entities.

None of the above confidentiality requirements should restrict the duty of Mastercard BCRs Entities to communicate the results of the audit report to the KSA DPA, nor should they limit the KSA DPA's or other competent DPAs' ability to issue an enforcement notice, in compliance with Applicable Law, where corrective action arising from the audit is ignored.

Where we act as Data Processor and subject to the strictest confidentiality obligations, we allow the Data Controller to request an audit of our data protection compliance program by external independent auditors, which are jointly selected by Mastercard and the Data Controller. The external independent auditor cannot be a competitor of Mastercard. Mastercard and the Data Controller will mutually agree upon the scope, timing, and duration of the audit. Mastercard will make available to the Data Controller the result of the audit of its data protection compliance program. The Data Controller must reimburse Mastercard for all expenses and costs for such an audit. In addition to the above, if the Data Controller requesting the audit is a competitor of Mastercard, Mastercard will be entitled, in cooperation with the jointly selected external auditor, to redact any commercially sensitive and confidential information from the audit report.

In addition, we bind our external Sub-Processors to: (1) provide Mastercard with the necessary information to help us verify the Sub-Processor's compliance with its data protection obligations; and (2) where necessary allow Mastercard to perform or order an on-site audit of the procedures relevant to the protection of Personal information on behalf of our customers, acting as Data Controllers.

VI. Liability

1. Responsibility Of Mastercard BCRs Entities

The Mastercard BCRs are enforced by all Mastercard BCRs entities in accordance with an Intra-Group Agreement. Each Mastercard BCRs Entity is responsible for complying with the BCRs. If a Mastercard BCRs Entity is in breach of the BCRs or otherwise unable to comply with them, Mastercard will take steps to address the issue, including suspending transfers where applicable.

In addition to the individual responsibility of Mastercard BCRs Entities, MAIT accepts responsibility and agrees to:

- Take the necessary action to remedy breaches of these BCRs caused by other Mastercard BCRs Entities located outside of KSA, and contractual breaches caused by Data Processors or Sub-Processors located outside of KSA.

- Pay compensation for any material or non-material damages incurred as a result of such breaches by a Mastercard BCRs Entity, a Data Processor or a Sub-Processor, unless MAIT can demonstrate that the damage could not be attributed to a Mastercard BCRs Entity, a Data Processor and a Sub-Processor.

2. Third Party Beneficiary Rights

In situations where Mastercard acts as a Data Controller, Individuals have the right to enforce the BCRs as third-party beneficiaries, including:

- The data protection principles and Individual's rights;

- The right to complain through the internal complaint mechanism.

- The right to lodge a complaint with a DPA and to seek judicial remedies and to claim compensation in courts;

- The process for handling conflicts of law;

- The duty to cooperate with DPA;

- This section on liability.

Therefore, if a Mastercard BCRs Entity violates the BCRs, courts and KSA DPA will have jurisdiction, and Individuals will have the rights and remedies against MAIT as if MAIT had committed the violation in the country in which Individuals are located (instead of the country of the Mastercard BCRs Entity outside of KSA).

In addition, in situations where Mastercard acts as a Data Processor, Individuals have the right to enforce the BCRs as third-party beneficiaries directly against Mastercard where:

- The requirements at stake are specifically directed to Data Processors in accordance with the KSA PDPL , in particular the duty to (i) respect the instructions received from the Data Controller, (ii) implement appropriate technical and organizational security measures, (iii) notify any Personal information Breach to the Data Controller, (iv) respect the conditions to engage a Sub-Processor, (v) cooperate with and assist the Data Controller in complying and demonstrating compliance with the law, (vi) provide easy access to BCRs, (vii) grant a right to complain through an internal complaint mechanism, (viii) cooperate with the KSA DPA; as well as requirements pertaining to (xi) liability, compensation and jurisdiction and (x) conflicts of law.

- They are not able to bring a claim against the Data Controller because the Data Controller has factually disappeared or ceased to exist in law or has become insolvent, unless any successor has assumed the entire legal obligations of the Data Controller by contract of by operation of law, in which case the Individuals can enforce their rights against such entity. In those situations, Individuals have the right to enforce the BCRs against MAIT.

Subject to and in accordance with the provisions of the KSA Data Protection Law, where Mastercard is in breach of its duties, Individuals are entitled to:

- Lodge a complaint before the KSA DPA or take action against Mastercard before the Courts where the Data Controller or Mastercard has an establishment or where the Individual has his or her habitual residence.

- Obtain proportionate compensation for the material or moral damage and to remedy breaches of the BCRs where an Individual suffered a damage as a result of the violation of the BCRs.

- Obtain a copy of the public version of the BCRs, including its appendixes, and a copy of the Intra-group Agreement (without any sensitive and confidential commercial information).

VII. Updates To The BCRs

We may update our BCRs to reflect, for example, changes in our Personal information practices, modifications of the regulatory environment or our company structure.

We commit to report changes to our BCRs without undue delay to all Mastercard BCRs Entities and to the KSA DPA, and where necessary, we will seek a new approval of the BCRs. In addition to the above, where we act as Data Processor and where a change affects the processing conditions, we will inform the Data Controller in a timely fashion so as to give the Data Controller the opportunity to object to the change or to terminate the contract before the modification is made.

VIII. How Can You Lodge A Complaint?

1. Internal Complaint Handling

We have implemented internal policies, processes and procedures to allow Individuals to exercise their rights and to manage complaints regarding our Personal information practices, and these are overseen by the Privacy & Data Protection Team, Mastercard's top management and the Data Protection Officer.

In situations where Mastercard acts as a Data Controller:

- If an Individual or a customer has reasons to believe that a Mastercard BCRs Entity has not complied with the BCRs, subject to and in accordance with the provisions of the KSA PDPL, they can lodge a complaint with the KSA DPA or directly with Mastercard.

- To lodge a complaint with Mastercard, Individuals can e-mail us at: Privacyanddataprotection@mastercard.com by including the term "BCRs" in the subject line.

- All complaints are handled by our Privacy & Data Protection Team, assisted by the Data Protection Officer, as follows:

    - We review the complaint and send an acknowledgement of receipt within ten (10) working days.

    - We then investigate the complaint and respond to it as soon as possible and within one month of receipt.

    - If the complaint is particularly complex, or given the number of complaints, Mastercard will provide an estimate of when the response will be provided to the complainant and in any event the response will be provided within three months of the receipt and will explain why it needs extra-time.

- If the complaint is upheld, Mastercard BCRs Entities take appropriate remedial measures as necessary to resolve the complaint and ensure compliance with the BCRs as appropriate.

- If an Individual is not satisfied with the response from the Privacy & Data Protection Team, that Individual can lodge a complaint with the competent Data Protection Authority or lodge a claim with a court in KSA.

Where we act as Data Processor, we strongly encourage Individuals to first seek to contact the relevant Data Controller. If we receive a complaint directly from an Individual, our Privacy & Data Protection Team will review the complaint and will forward it to the relevant

Data Controller.

2. Redress for Individuals

In addition to the internal complaint described above, subject to and in accordance with the KSA PDPL, Individuals can seek redress by lodging a complaint with the KSA DPA. Subject to and in accordance with the KSA P, Individuals are free to lodge a complaint with the KSA DPA.

When we act as Data Processor on behalf of customers, customers who believe that our BCRs are not complied with have the right, subject to and in accordance with the provisions of the KSA PDPL, to seek redress by lodging a complaint with KSA DPA.

3. Duty of Cooperation

Mastercard BCRs Entities will cooperate with requests, queries or complaints from Individuals, Data Controllers, KSA DPA in a transparent, timely, responsive and open manner. Mastercard BCRs Entities will accept to be audited, cooperate with inspections (where necessary on-site) by, and follow the recommendations and decisions of the KSA DPA regarding the implementation of the BCRs of the BCRs, including by providing information, upon request from KSA DPA, about its Processing operations covered by the BCRs.

When responding to requests and queries from the KSA DPA we will follow appropriate procedures relating to the nature of the request and timelines indicated by the requesting authority. Any dispute with the KSA DPA arising from its supervision of compliance with the BCRs will be resolved by the courts of the KSA. Mastercard BCRs Entities will submit to the jurisdiction of KSA courts.

IX. How Do We Handle Potential Conflicts Of Law?

The BCRs Entities transfer Personal information based on these BCRs when they have determined that the local laws and practices of the destination country (as applicable to the Data Importer) do not prevent them from fulfilling their obligations under the BCRs.

Where a Mastercard BCRs Entity has reasons to believe that local law or practices are likely to prevent it from fulfilling its obligations under these BCRs and where complying with such local law is likely to have a substantial adverse effect on the guarantees provided by these BCRs or conflicts with the provisions of KSA PDPL, the matter is referred to the Privacy & Data Protection Team for resolution.

Our Privacy & Data Protection Team reviews each matter on a case-by-case basis and, where necessary, assists the BCRs Entities in identifying supplementary measures to enable them to fulfil their obligations under the BCRs. Where appropriate, the identified supplementary measures will be applied for the same type of transfers performed by other BCRs Entities.

If we receive an access request for Personal information by a law enforcement authority or state security body (“requesting agency”), the matter is referred to the central Law Enforcement Support team within Mastercard, which will inform the relevant Mastercard entity as appropriate. Where there are reasons to believe that the request is likely to prevent a Mastercard BCRs Entity from fulfilling its obligations under the BCRs, the Privacy & Data Protection Team is consulted.

We respond to the request by informing the requesting agency about our limited data set. We also refer the requesting agency to the appropriate financial institution, which holds more

comprehensive information about the relevant cardholder.

Where the requesting agency pursues the request, we ensure that it follows the required legal process for its country and jurisdiction, including any applicable privacy safeguards. If there is a question about the legitimacy or scope of the request, (e.g., where there are reasonable grounds to consider that the request is unlawful under the laws of the country of destination, applicable obligations under international law, and principles of international comity), we challenge it. Only when we are satisfied that the legal process is valid and appropriate, and when we are convinced that the request does not prevent a Mastercard BCRs Entity from fulfilling its obligations under these BCRs and does not have a substantial effect on the guarantees provided by them, do we deliver the narrowest possible set of data required to be responsive to the request while ensuring data minimization.

When the suspension and/or notification are prohibited, such as in case of a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation, Mastercard will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible to the KSA DPA and be able to demonstrate that it did so. If despite having used its best efforts, Mastercard is not in a position to notify the KSA DPA, it will provide general information on the requests (e.g., number of applications for disclosure, type of Personal information requested, requesting agency if possible) to the KSA DPA upon request or whenever needed.

In addition to the above, where a Mastercard BCRs Entity acts as Data Processor, we notify the Data Controller when local laws prevent the Mastercard BCRs Entity (1) from fulfilling its obligations under these BCRs and have a substantial adverse effect on the guarantees provided by these BCRs, and (2) from complying with the instructions received from the Data Controller via the Mastercard Rules or the data processing agreement between Mastercard and the Data Controller. We do not notify Data Controllers if such disclosure is prohibited by Applicable Law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation. The Data Controller is responsible for notifying its competent Data Protection Authority if applicable and as authorized under Applicable Law.

Appendix 1 Mastercard Entities Covered By The BCRs

Mastercard BCRs Entities and Mastercard Staff are bound to respect the BCRs. At a high-level, Mastercard BCRs Entities are structured as follows:

- Mastercard Arabia for Information Technology (MAIT) Limited Liability Company, 2886, Northern Ring Rd, Al Aqeeq District, Riyadh, Kingdom of Saudi Arabia is the member of the Mastercard Group, operating in the Information Technology (IT) Services/Software Development and Consulting is the locally registered entity responsible for the BCRs
- Mastercard Asia/Pacific Pte. Ltd. 3 Fraser Street, DUO Tower, #17 - 21/28, Singapore 189352 is the contracting entity for Mastercard in KSA
- Mastercard International Incorporated is the global headquarters of Mastercard (address in the table).
- All other entities are subsidiaries or affiliates of Mastercard Arabia for Information Technology, KSA or Mastercard International Incorporated.

The following Mastercard BCRs Entities have signed Mastercard's Intra-group Agreement:

The following list is accurate as of March 2024. For a fully updated list of entities please contact the Privacy & Data Protection Team at Privacyanddataprotection@mastercard.com.

FOR EUROPE:			
Country	**Mastercard BCRs Entity**	**Registration number**	**Contact Details**
Armenia	Armenia Representative Office of Mastercard Europe S.A.		51 Komitas ave, 51/4, Arabkir district, Yerevan, Armenia 0014, Armenia
Austria	Austria Representative Office of Mastercard Europe SA	300398440/ UID ATU642 17378	Wipplingerstraße 30/DG, Vienna 1010, Austria
	IfOnly Austria GmbH	FN 50 1126	Küniglberggasse 7, Vienna 1130, Austria
Azerbaijan	Azerbaijan Representative Office of Mastercard Europe SA	1403433041	AZ10784/189 Falez Plaza 6th Floor, Nasimi District Hasan Aliyev, Baku City, Azerbaijan AZ1078
Belarus	Belarus Representative Office of Mastercard Europe SA	102397251	4-32 Zybitskaya Str., 2nd (second) floor No: 32-1, Minsk, 220030, Belarus
Belgium	Mastercard Europe S.A.	0448.038.446	Chaussée de Tervuren 198A B- 1410, Waterloo, Belgium
	Belgium Branch (Waterloo) of Maestro International Incorporated	0463.192.915	Chaussee de Tervuren 198A, Waterloo, 1410, Belgium

	Mastercard Jupiter Investments SPRL	0830.805.493	Chaussee de Tervuren 198A, Waterloo, Belgium 1410, Belgium
	Mastercard Transaction Services (Europe) SA	0549987921	Chaussée de Tervuren 198A, Waterloo 1410, Belgium
Bosnia & Herzegovina	Bosnia and Herzegovina Representative Office of Mastercard Europe SA	4202169990006	-UNITIC Business Centre, Fra Andela Zvizdovica 1, Sarajevo71000, Bosnia and Herzegovina
Bulgaria	Bulgaria Rep. Office of Mastercard Europe SA	176381804	-88 Kniaz Aleksandar Dondukov Blvd, fl. 4, Oborishte Region,Sofia, Bulgaria 1527, Bulgaria
Bulgaria	Sel Int Ltd Bulgaria EOOD	200217365	37A Fridtjof Nansen str, 5th floor, Sredets Region, Sofia 1142, Bulgaria
Croatia	Croatia Branch of Mastercard Europe SA	080867029	Radnička cesta 80/12, Zagreb Tower, Zagreb 10000, Croatia (Local Name: Hrvatska)
Cyprus	Cyprus Rep office of Mastercard Europe SA	AE3516	Hadjikyriakeion Bld 1, 121 Prodromou Avenue, 1st floor, Nicosia 2064, Cyprus
Czech Republic	Czech Republic Branch of Mastercard Europe SA	693 45 724	Palladium, Na Porici 1079/3a, 110 00 Prague 1, Czech Republic
	Session M Czech Republic s.r.o.	077 21 587	Pernerova 697/35, Karlin, 186 00 Prague 8, Czech Republic
Denmark	Denmark Branch of Mastercard Europe SA	37501727	Arne Jacobsens Allé 13, København S, Copenhagen, Denmark
	Mastercard Payment Services Denmark A/S	40695869	Arne Jacobsens Alle 13, Copenhagen S 2300, Denmark
	Aiia A/S	35509006	Artillerivej 86, ST. TV., 2300 Copenhagen, Denmark
Finland	Finland Branch of Mastercard Europe SA	2751634-9	Etelaesplanadi 2, 3C/4D Krs. Helsinki, 00130 Finland
France	Mastercard France SAS, France	501573158	112, Avenue Kleber 75784 Paris Cedex 16 France
	France Branch of HomeSend SPRL	821 562 360	31 Chemin du Vieux Chene, Meylan 38240, France

	France Branch of Mastercard Transaction Services Europe SA	821562360	Montbonnot Valley, 26 Avenue Jean Kuntzmann, Montbonnot-Saint-Martin, 38330, France
Georgia	Georgia Representative Office of Mastercard Europe SA	404552649	737M Ilia Chavchavadze Avenue, Floor 5, Tbilisi, Georgia,
Germany	Germany Representative Office of Mastercard Europe SA	006 412 000	Taunusanlage 9-10, Frankfurt/-am Main 60329, Germany
	Dynamic Yield GmbH	HRB 115651	c/o MAZARS Tax GmbH, Theodor-Stern-Kai 1, Frankfurt am Main 60596, Germany
Greece	Mastercard Europe Greece Single Member S.A.	156214201000	Vasilissis Sofias Avenue No 23, Athens, 10674, Greece
Hungary	Hungary Representative Office of Mastercard Europe SA	01-12-073361	Paulay Ede utca 55, Budapest, Hungary 1061, Hungary
	Mastercard Magyarország Korlátolt Felelősségű Társaság	01-09-383338	Deak Ferenc ucta 5, Budapest 1052, Hungary
	Ekata Global Hungary Kft	01-09-171264	1092 Budapest, Köztelek utca 6. 3. em., Hungary
Ireland	Ethoca Limited	412289	Mountain View, Central Park, Dublin 18, Ireland
	Ethoca Nominees Limited	557283	Mountain View, Central Park, Dublin 18, Ireland
	Mastercard Ireland Limited, Ireland	499963	One South County, South County Business Park, Dublin 18, Ireland
	Truata (Management) Limited	627068	Whelan House, South County Business Park, Leopardstown, Dublin, Ireland D18 T9P8, Ireland
	Truata Holdings Limited	622419	Whelan House, South County Business Park, Leopardstown, Dublin, Ireland D18 T9P8, Ireland
	Truata Limited	622418	Whelan House, South County Business Park, Leopardstown, Dublin, Ireland D18 T9P8, Ireland
Israel	Mastercard Israel Subsidiary Ltd.	515837888	Aluf Kalman Magen 3, Tel Aviv, 6107075 Israel
	Finsec Lab Ltd.	516105624	Aluf Kalman Magen St. 3, Tel Aviv-Yafo 6107075, Israel
	Dynamic Yield Ltd.	51-474336-8	114 Alon Yigal street, Tel

			Aviv - Jaffa, Israel 6744320, Israel
Italy	Italy Branch of Mastercard Europe SA	97091560587	–Via Turati, 30, Milan, Italy 20121, Italy
Kazakhstan	Kazakhstan Representative Office of Mastercard Europe SA	120542010604	-n.p.8a, 77/7 Al-Farabi Avenue, 050040 (A15E3H4), Almaty,050040 Kazakhstan
Latvia	SIA Dynamic Yield	40203360276	Duntes iela 6, Rīga LV-1013, Latvia
Lebanon	Mastercard Lebanon Representative Office	2975	Beirut Souks 1479/Al Marfa'a, Bloc M 4th Floor, Beirut, Lebanon
Macedonia, The Former Yugoslav	Mastercard Europe Kingdom of Belgium – Representative office in Republic of North Macedonia Skopje	7652186	Filip Vtori Makedonski N 5, the North Macedonia, Skopje 1000, Macedonia, The Former Yugoslav
Moldova	Mastercard Europe SA Waterloo Sucursala Chisinau	1022600054060	Alexandru cel Bun str, 49, Chisinau, Moldova MD-2012, Moldova, Republic Of
Netherlands	Netherlands Branch of Mastercard Europe SA-	50304348	Prins Hendrikkade 48, Amsterdam, Netherlands 1012AC, Netherlands
	Trans-Fast International Cooperatief, UA	59274034	De Lairessestraat 145 A, Amsterdam, Netherlands 1075HJ, Netherlands
	Ekata Global - Netherlands B.V.	74096397	Prins Hendrikkade 48, 1012AC Amsterdam, The Netherlands
Norway	Norway Branch of Mastercard Europe SA	816 220 122	Regus Posthuset, Biskop Gunnerus gate 14a, Oslo 0185, Norway
	Mastercard Payment Services Infrastructure (Norway) AS	922988862	Haavard Martinsens vei 51, Oslo 0978, Norway
	Mastercard Payment Services Norway AS	822988822	Haavard Martinsens vei 51, Oslo 0978, Norway
Poland	Poland Branch of Mastercard Europe SA	0000345959	Warsaw Spire, 30th Floor, Plac Europejski 1 Warsaw 00-844, Poland
	Mastercard S.A.	0000316035	Dominikanska, 02-738, Warsaw, Poland
Portugal	Portugal Representative Office of Mastercard Europe SA	980276500	Portugal Praça Marquês de Pombal, nº 14, Lisbon, Portugal 1250 162, Portugal
	Mastercard Portugal, Unipessoal Lda	516889842	Principal Place of Business: Praça Marquês

			de Pombal, nº 14, Lisbon, Portugal 1250 162 Registered Agent: Avenida
Romania	Mastercard Europe SA Waterloo Sucursala Bucuresti	38645357	4-8 Nicolae Titulescu Street America House Building, West Wing, 2nd Floor, 011141 Bucharest, Romania
Russia	Russia Representative Office of Mastercard Europe SA	NAN2015001113 4 TIN	10 Bolshaya Dmitrovka Street, Building 4, Moscow, Russian Federation, Russian Federation
	Mastercard OOO~~,~~	1107746323926	10 Bolshaya Dmitrovka St., Building 4, Moscow, Russia, Russian Federation
Serbia	Mastercard Europe S.A., Serbia Representative Office~~,~~	29026866	Milutina Milankovića 1ž, Entrance B, 5th floor, Belgrade~~,~~ 11070, Serbia
Slovenia	Mastercard Europe S.A., Slovenia Branch	7203543000	Dimičeva ulica 013, Ljubljana 1000, Slovenia
Slovak Republic	Slovak Republic Branch Office of Mastercard Europe SA	54864658	Mlynske Nivy 5, Bratislava-Ruzinov 821 09, Slovakia (Slovak Republic)
Spain	Spain Branch of Mastercard Europe SA	W0171837H	Paseo de la Castellana, 259 C, 11ª Torre Cristal / 28046 Madrid, Spain
	Mastercard Spain Holdings, Sociedad Limitada	M569558 Book 31651/90	Avenida de Concha Espina 39B, Madrid 28016, Spain
Sweden	Mastercard Sweden Services AB	559089	Kungsgatan 33, 4th Floor SE- 111 56 Stockholm, Sweden
	Baffin Bay Networks AB	559035-6183	Kungsgatan 33, 4tr, 111 56, Stockholm Sweden
Switzerland	Switzerland Branch of Mastercard Europe SA	CHE-110.335.313	Löwenstrasse 25 8001 Zürich
Turkey	Turkey Representative Office of Mastercard Europe SA	3810044245	Tamburi Ali Efendi Sok., No: 1334337 Etiler – Istanbul
Ukraine	Ukraine Representative Office of Mastercard Europe SA	26600463	17/52 Bogdana Khmelnitskogo street, floor 4 A, office 404 A, Kiev,-01030, Ukraine
UK	Mastercard Prepaid Management Services Limited	05429739	Access House, Cygnet Road Hampton, Peterborough, PE7 8FJ,

			United Kingdom
	Mastercard Payment Gateway Services Limited, UK	03430157	10 Upper Bank Street London, E14 5NP United Kingdom
	Mastercard Payment Gateway Services Group Limited	03168091	19th Floor, 10 Upper Bank Street, London, E14 5NP, United Kingdom
	Mastercard UK Management Services Ltd, UK	4617367	7th Floor, 1 Angel Lane, London EC4R 3AB, United Kingdom
	Vocalink Holdings Limited	06119036	1, Angel Lane, 9th Floor, London EC4R 3AB, United Kingdom
	Vocalink Limited	06119048	1 Angel Lane, London, EC4R 3AB, United Kingdom
	Vocalink International Limited	11646063	1, Angel Lane, 9th Floor, LONDON, United Kingdom
	Voca Ltd	01023742	Drake House, Three Rivers Court, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
	Voca Pension Trustees Ltd	09655475	Drake House, Three Rivers Court, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX,
	Vocalink Interchange Network Ltd	03565766	1, Angel Lane, 9th Floor, LONDON, United Kingdom EC4R 3AB, United
	VocaLink Retail Services Ltd	02094831	Drake House, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
	Mastercard OB Services UK Limited	12507991	1 Angel Lane, London, EC4R 3AB, United Kingdom
	Mastercard Transaction Services (UK) Ltd.	07031967	1 Angel Lane, London, England, EC4R 3AB
	CATSEC 401 Ltd	02999731	1 Angel Lane, London, United Kingdom EC4R 3AB, United Kingdom
	CEL Int, Ltd UK	06678417	Studio 116, Grand Union Studios, 332 Ladbroke Grove, London, United Kingdom,
	Ethoca Dynamic Yield UK Limited	9099120	Highlands House Basingstoke Road,

			Spencers Wood, Berkshire, Reading, England RG7 1NT, United Kingdom
	Global Mastercard Holdings LP	LP16352	10 Upper Bank Street, London, El4 5NP, England United Kingdom
	IPco 2012 Ltd	08330583	1, Angel Lane, London, United Kingdom EC4R 3AB, United Kingdom
	Mastercard Europe Services Limited	09210818	10 Upper Bank Street, Canary Wharf, London, England E14 5NP, England
	Mastercard Holdings LP	LP16341	10 Upper Bank Street, Canary Wharf, London England
	Mastercard UK Holdco Limited	10255459	1 Angel Lane, London, United Kingdom EC4R 3AB, United Kingdom
	Mastercard/Europay U.K. Limited	2398979	7th Floor, 1 Angel Lane, London, EC4R 3AB, United Kingdom
	Traina Interactive LTD	11033652	7 Albemarle Street, London W1S 4HQ, United Kingdom
	Truata (UK) Limited	13111385	Regency House, 45-53 Chorley New Road, Bolton, United Kingdom BL1 4QR, United Kingdom
FOR NORTH AMERICA:			
Country	**Mastercard BCRs Entity**	**Registration number**	**Contact Details**
Canada	Mastercard Technologies Canada ULC	1146475	475 Howe Street, Vancouver, British Columbia V63 2B3, Canada
	Ethoca LLC	4723423	4211 Yonge Street, Suite 202, Toronto, Ontario M2P 2A9, Canada
	Ethoca Technologies Inc.	2087762	100 Sheppard Ave. East, Suite 605, Toronto, ON M2N 6N5, Canada
	Mastercard Canada ULC	823401195BC0001	Georgia PO Box 49290, 1000 – 595 Street, British Columbia BC V7X 1S8, Canada

	MC MAPLE ACQUISITION ULC	BC1199328	PO Box 49290, 1000-595 Burrard Street, Vancouver, British Columbia V7X IS8,
	Mastercard Transaction Services (Canada) Inc.	1688924	121 Bloor-Street, Toronto, Ontario M3J1L6, M4W 3M5, Canada
	Mastercard Vocalink Canada Limited	BC1321670	PO Box 49290, 1000 - 595 Burrard Street, Vancouver, British Columbia V7X 1S8, Canada
	Mastercard Canada Open Finance Solutions ULC	BC1379514	-2600 - 1066 West Hastings Street, Vancouver, British Columbia V6E 3X1, Canada
United States	Mastercard International Incorporated	648928	2000 Purchase Street Purchase,—New York 10577-2509, United States
	Mastercard Technologies, LLC	3457984	2200 MasterCard Boulevard 63368-7263 O'Fallon, Mo U.S.A
	Mastercard International Services, Inc.	3454605	2000 Purchase Street, Purchase New York 10577
	Maestro International Incorporated	2364231	2000 Purchase Street, Purchase, New York, 10577-2509, United States
	Mastercard Advisors, LLC	3736123	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC Europe	4332162	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC APMEA	4332163	2000 Purchase Street, Purchase, New York 10577, United States
	Orbiscom Inc.	3162153	2000 Purchase Street, Purchase, Harrison, NY 10577-2509 United States
	Mastercard Mobile Transactions Solution, Inc.	59760807	2000 Purchase Street, Purchase New York 10577-2509, United States
	Mastercard Travelers Cheque, Inc.	2197420	2000 Purchase Street, Purchase New York 10577
	Applied Predictive Technologies, Inc.	3146225	4250 N Fairfax Drive; 11th Floor; Arlington, Virginia 22203, United States
	APT Software Holdings, Inc.	4202357	4250 North Fairfax Drive, 11th Floor, Arlington,

			Virginia, 22203, U.S.A.
	Brighterion, Inc.	3176106	123 Mission Street, Suite 1700, San Francisco, California 94105 United States
	Ekata Inc.	3999312	1301 5th Avenue, #1600, Seattle, Washington 98101, United States
	Eurocard U.S.A., Inc.	0100052091	9 East 46th Street, New York, New York 10017, United States
	Finicity Corporation	4188418	434 West Ascension Way, Suite 200, Salt Lake City, Utah 84123, United States
	Humanity Ventures LLC	6609893	2000 Purchase Street, Purchase, New York 10577, United States
	IfOnly MX Holding LLC	6567043	150 Green St., 3rd Floor, San Francisco, California 94111, United States
	Mastercard A&M Investment Holdings, LLC	5446149	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Africa, Inc.	3229450	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Center for Inclusive Growth, Inc.	5483520	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Colombia Holdings, LLC	5480411	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Investments, LLC	5480412	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Processing, LLC	5480414	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Colombia Technologies, LLC	5480415	2000 Purchase Street, Purchase, New York 10577- 2509, United States
	Mastercard Colombia, Inc.	2477931	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Ecuador, Inc.	4565125	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard EMEA, Inc.	2503294	2000 Purchase Street,

			Purchase, New York 10577-2509, United States
	Mastercard Financing Solutions LLC	3692050	2000 Purchase Street, Purchase, New York, 10577-2509, United States
	Mastercard Incorporated	3390142	2000 Purchase Street, County: Westchester, Purchase, New York 10577-2509, United States
	Mastercard International Philippines, Inc.	2753003	1209 Orange Street, Wilmington, DE 19801
	Mastercard Investment Holdings, Inc.	5005370	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Latin America Holdings, Inc.	4888456	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Mercosur, Inc.	2633468	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Middle East, Inc	3546843	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Partners LLC	5635607	2000 Purchase Street, Legal Department, Purchase, New York 10577-2509, United
	Mastercard Peru, Inc	3157575	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Prepaid Management Services USA, Inc.	4933598	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Puerto Rico, LLC	192-LLC	-350 Ave Carlos E. Chardon, Suite 225, San Juan, Puerto Rico 00918, United States
	Mastercard UK, Inc.	3245417	10 Upper Bank Street, London, E14 5NP, United Kingdom
	Mastercard US Holdings LLC	5619847	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Venezuela, Inc.	2451848	801 Brickell Avenue, Suite 1300, Miami, Florida 33131, United States
	MTS Holdings, Inc.	2468513	2000 Purchase Street, Purchase, New York

			10577-2509, United States
	Purchase Street Holdings, LLC	6985806	2000 Purchase Street, Purchase, New York 10577, United States
	Purchase Street Insurance Services, LLC	4889544	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Purchase Street Reinsurance, Inc.	V750630	400 Cornerstone Drive, Sute 240, Chittenden County, Williston, Vermont 05495,
	RiskRecon, Inc.	5807551	5241 South State Street, Unit 3, Salt Lake City, UT 84107
	Session M, Inc.	4861126	225 Franklin Street, 9th Floor, Boston, Massachusetts 02210
	Mastercard Transaction Services Corp.	7319857	Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware
	Traina Interactive Corp.	5043837	123 Mission Suite 1700, San Francisco, California 94105, United States
	Trans-Fast Remittance Holding, LLC	5428620	Corporation Trust Company, 1209 Orange Street, Suite 400, New York, NY 10005
	Mastercard Transaction Services (US) LLC	4238893	150 Fifth Avenue, New York, New
	Mastercard Transaction Services (California)	3655952	44 Wall Street, 150 Fifth Avenue, New York 10011 United States
	Mastercard Transaction Services (Nevada) Inc.	E0401882016-1	150 Fifth Avenue, New York, New York 10011, United States
	Arcus Financial Intelligence, Inc.	5126491	214 W. 29th St., New York, New York 10001, United States
	Ciphertrace, Inc.	5817112	140 Victory Lane, Los Gatos, California 95030, United States
	Truata LLC	5847238	c/o MASTERCARD INTERNATIONAL INCORPORATED, ATTENTION: CORPORATE SECRETARY, 2000 PURCHASE STREET, PURCHASE, NY, 10577,

			USA
FOR ASIA PACIFIC:			
Country	**Mastercard BCRs Entity**	**Registration number**	**Contact Details**
Australia	Mastercard Loyalty Solutions Australia Pty Ltd	002693656	72 Christie Street, St Leonards NSW 2065, Australia
	APT Australia Pty. Ltd.	603177171	72 Christie Street, St Leonards, NSW 2065, Australia
	Burst Acquisition Co. Pty. Ltd.	ACN 644 142 834	72 Christie Street, St Leonards, NSW 2065, Australia
	Ethoca Australia Branch	ABN: 891 864 66976	100 Harbour Esplanade Docklands, Victoria 3008, Australia
	IfOnly Australia Pty Ltd.	629 248 399	Suite 204, 477 Collins Street, Melbourne, Victoria VIC 3000, Australia
	Mastercard Asia/Pacific (Australia) Pty Ltd	108 603 345	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Holding Pty Ltd	143 337 722	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Pty Ltd	168 732 429	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Prepaid Management Services Australia Pty Ltd	145 452 044	72 Christie Street, St. Leonards, NSW 2065, Australia
	Mastercard Travel Solutions Australia Pty Ltd	003 745 999	72 Christie Street, St Leonards, NSW 2065, Australia
	Plus Points Pty Ltd	101 890 537	72 Christie Street, St Leonards, NSW 2065, Australia
	PPS Loyalty Pty Ltd	129 013 921	72 Christie Street, St Leonards, NSW 2065, Australia
	Trans-Fast Pty, Ltd	95149710494	53B Sunnybank Hills Shopping Town, Sunnybank Hills, Australia QLD 4109, Australia-

	Wameja Pty Ltd	052 947 743	72 Christie Street, St Leonards, NSW 2065, Australia
Bangladesh	Bangladesh, Liaison office of Mastercard Transaction Services (US) LLC	03.219.344.00.00.0000.2530.02092019	City Centre, Level-27, Suite # 26 A1-A2, 90/1, Motijheel, C/A, GPO, Dhaka, PO: 1000
	Bangladesh Representative Office of Mastercard Singapore Holding Pte. Ltd.	03.219.344.00.00.0000.2478.24072019	Crystal Place (12th Floor), SE (D) 22, Road #140, Gulshan South Avenue, Gulshan- 1, Dhaka 1212,
Cambodia	Cambodia Representative Office of Mastercard Singapore Holding Pte. Ltd.	1784/2015	Canadia 18th Floors, No. 315, Aung Doung Street Corner Monivong Blvd, Sangkat Wat Phnom, Khan Daun Penh,
China	APT Technology Consulting (Shanghai) Co., Ltd.	91310115MA13LDL5Q	Unit 1904, No. 8 Central Avenue, Pilot Free Trade Zone, Shanghai, China
	Beijing Branch of Mastercard Information Technology (Shanghai) Co., Ltd	110000450260468	B1207, NO.26, Chaowai Street, Chaoyang District, Beijing, China
	China Branch (Beijing) of Mastercard Shanghai Business Consulting Co., Ltd.	1100004501658 14	Room 501A, 5th Floor, China Resources Building, No. 8 Jianguomenbei Avenue, Dongcheng District, Beijing 10005, China
	China Branch (Guangzhou) of Mastercard Shanghai Business Consulting Co. Ltd.	440101400068925	Room 2015-16A, CITIC Plaza, No. 233 Tianhe North Road, Guangzhou, 510613, China
	China Representative Office (Beijing) of Mastercard International Incorporated	91110000X00004579	No. 8 Janguomen Wei Ave., China Resources Building, Room 701-702, Beijing, 100005, China
	China Representative Office (Guangzhou) of Mastercard International Incorporated	914401017812109 58N	Room 2015-16A, CITIC Plaza, No. 233 Tian He North Road, Guangzhou, Guangzhou
	Mastercard Information Technology (Shanghai) Co., Ltd.	[2010]0192	No. 68 Middle Yin Cheng Road, Suite 04, Floor 40, One Lujiazui, Pudong New District, Shanghai, China, China
	Mastercard Netsunion Information Technology (Beijing) Co, Ltd.	91110102MA01HHL193	Room 111, No. 101 Building 3, Beishanhuan Middle Road No. 29, Xicheng District, Beijing,

			China
	Mastercard Shanghai Business Consulting Ltd.	310000400564516	Room 2907-14, 29/F, Shanghai IFC, 8 Century Avenue, Pudong, Shanghai, China 200120, China
	Pudong Branch of Mastercard Information Technology (Shanghai) Co.,	310115500130618	Room 04, 40/F, One Lujiazui | No.68, Middle Yincheng Road, Shanghai, China
Hong Kong	Mastercard Asia/Pacific (Hong Kong) Limited	34668852	Suite 1801-03, 18/F Central Plaza, 18 Harbour Road, Wanchai, Hong Kong (Registered Office)
	Mastercard Loyalty Solutions China Limited	50677275	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong, Hong Kong
	Mastercard Loyalty Solutions Hong Kong Limited	31708219	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong, Hong Kong
	Mastercard Loyalty Solutions International Limited	30784268	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong, Hong Kong
	Mastercard Travel Solutions Hong Kong Limited	58059586	Unit 5805, 58/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong, Hong Kong
	New York Bay (Hong Kong) Ltd	64514596	Unit 5805, 58/F, Two International Finance Centre, 8 Finance Street, Central Hong Kong, Hong Kong, Hong Kong, Hong Kong
India	Mastercard India Services Private Limited	U93000HR2012FTC047951	4th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon – 122 002, India
	Mastercard Technology Private Limited, India	U72200PN2000PTC014585	Business Bay, 10th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club Golf Course Airport Road, Yerwada, Pune – 411006, India
	Mastercard Mobile Transactions Solutions	U72200PN2005PTC165613	Business Bay, 4th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club

	Private Limited		Golf Course Airport Road, Yerwada, Pune – 411006, India
	Mastercard Loyalty Solutions India Private Limited	U74900MH209PTC190903	602-603, Windfall, Sahar Plaza, J B Nagar, Andheri- Kurla Road Mumbai, Maharashtra, 400 059 India
	India Branch (Gurgaon) of MasterCard Advisors, LLC APMEA	83.050.2012.13	5th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon, Haryana 122002 (PIN, India
	India Rep Office of Mastercard International Incorporated	NDL092000069	11th Floor, Tower D, Global Business Park, M.G. Road, Gurgaon, Haryana, Haryana, New Delhi 122002, India
	Finicity Technologies Private Limited	U72200MH2005PTC154044	Ellora Fiesta, Sector 11, Sanpada, Mumbai, India
	Mastercard Switching Services India Private Limited	U74999PN2021FTC203994	Fourth Floor, Wing-1, Business Bay, Survey No. 103, Hissa No. 2 Airport Road, Yerwada, Pune, Maharashtra 411006, India
	Mastercard Money Transfer Services India Private Limited	U67190PB1995PTC015897	Lower Ground Floor, Office No. 6, City Square EH-197, Civil Lines, Jalandhar PB, 144001, India
	Mastercard Money Transfer Services India Private Limited	U67190MH2010FTC206754	10th Floor, The Pavilion, Sneapati Bapat Road, Pune, Maharashta, 411016, India
Indonesia	PT Mastercard Indonesia	09.05.1.70.680008	Sentral Senayan 1, Lt. 17/117 E, JL., Asia Afrika No. 8, Central Jakarta, Indonesia,
Japan	Japan Branch of Mastercard Loyalty Solutions International Limited	708782	Cerulean Tower, 16th floor, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan
	Mastercard Japan K.K.	0110-01-051453	Cerulean Tower 16F, 26-1 Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan 150-8512,
	Mastercard Prepaid Management Services Japan	0110-01-069577	Cerulean Tower, 16th Floor, 26-1 sakuragaoka-cho, shibuya-ku

	KK		Tokyo150-8512, Tokyo 100-8133, Japan
	Mastercard Services Japan Limited	Nepal Liaison Office of Mastercard Transaction Services (US) LLC NNN0110-03-006898	Cerulean Tower 16th Floor, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan
Malaysia	Malaysia Branch of Mastercard Asia/Pacific Pte. Ltd.	200402000010	Suite 3.1 & 3.2, Level 3, Menara 1 Dutamas, Solaris Dutamas, No 1, Jalan Dutamas 1, Kuala Lumpur, Malaysia 50480, Malaysia
	MASTERCARD TRANSACTION SERVICES (MALAYSIA) SDN BHD	1220440-D	43-2, Plaza Damansara, Jalan Medan Setia 1, Bukit Damansara, Kuala Lumpur Wilayah Persekutuan, 50490, Malaysia
Myanmar	Mastercard Myanmar Limited	127160295	Level 10, Unit 01-05, Junction City Officer Tower, Corner of Bogyoke Aung San Road and 27th Street, 11181 Pabaedan Township Yangon, Myanmar
Nepal	Nepal Liaison Office of Mastercard Transaction Services (US) LLC	159346	Ward No. 29, Anamnagar, Kathmandu, Nepal
New Zealand	Mastercard Loyalty Solutions New Zealand Limited	229 8309	Martelli McKegg, Level 20, Pwc Tower, 188 Quay Street, Auckland, 1010, New Zealand
	Mastercard New Zealand Limited	1893982	C/- Martelli McKegg, Level 20, PwC Tower, 188 Quay Street, Auckland, 1141, New Zealand
	Mastercard Prepaid Management Services (NZ) Limited	3261147	Level 3, MasterCard House, 136 Customs Street, West Auckland, 1010, New Zealand
Philippines	Mastercard Transaction Services (Philippines)~~,~~ Inc.	182094	Unit 2-7 Level 18 IBP Tower, Dona Julia Vargas Avenue, Ortigas Center, Pasig City, Philippines
	Philippines Branch of Mastercard International Philippines, ~~,~~ Inc.	A199915970	27/F Unit D, Tower One and Exchange Plaza, Ayala Triangle, Ayala Avenue, Makati City,

			Manila, Philippines
	Philippines Branch of Mastercard Singapore Holding Pte. Ltd.	FS201222408	Units 903 & 904 - 9th Floor, Tower One, Ayala Triange, Ayala Avenue, Makati City, Philippines
Singapore	Mastercard Asia/Pacific Pte. Ltd, Singapore	199306324E	3 Fraser Street DUO Tower, Level 17, Singapore 189352
	Access Prepaid Singapore Pte. Ltd.	201105746G	12 Marina View, #11-01 Asia Square Tower 2, 018961, Singapore
	Mastercard AP Financing Pte. Ltd.	201731499K	3 Fraser Street, #17-21/28, Duo Tower,—189352, Singapore
	Mastercard Labs Kenya Holdings Pte. Ltd.	201431144W	3 Fraser Street, DUO Tower 17-21/28, 189352, Singapore
	Mastercard Loyalty Solutions Singapore Pte. Ltd.	199302957W	10 Changi Business Park Central 2, #05-01, Hansapoint@CBP, 486030, Singapore
	Mastercard Singapore Holding Pte. Ltd.	201008183D	3 Fraser Street, DUO Tower #17-21/28, 189352, Singapore (Registered Office)
	Mastercard VocaLink Asia Pacific Pte. Ltd.	201927008N	3 Fraser Street, #17-21/28, Duo Tower, Singapore, Singapore, Singapore
	Mastercard Transaction Services Singapore Pte. Ltd	201700267K	3 Fraser Street #17-, Duo Tower, Singapore 189352, Singapore
	Ekata Global - Singapore Pte. Ltd	201942960H	3 Fraser Street, DUO Tower, #17-21/28, Singapore 189352, Singapore
	Dynamic Yield APAC Pte. Ltd.	201702196R	12 Marina View, #11-01, Asia Square Tower 2, Singapore 018961, Singapore
South Korea	Mastercard International Korea Ltd.	113023	16F, Seoul Finance Center, 136 Sejongdaero Junggu, Seoul, 00-768, Republic of Korea
Sri Lanka	Sri Lanka Rep Office of Mastercard Singapore Holding Pte. Ltd.	1263	Regus 26, East Tower, World Trade Centre, Echelon Square, Colombo, Sri Lanka
	Transfast (Private) Limited	212470	Bernards Business Park, 2nd Floor, 106 Dutugemunu Street,

			Kohuwala, Dehiwala, Sri Lanka
Taiwan	Taiwan Branch of Applied Predictive Technologies, Inc.	2899-4556	42F., NO.68, SEC. 5, ZHONGXIAO E. RD., XINYI DIST., TAIPEI CITY, 11065, Taiwan
	MASTERCARD SINGAPORE HOLDING PTE. LTD., TAIWAN BRANCH	28987963	42 F, No. 68, Sec. 5, Zhongxiao E. Road, Zinyi District, Taiwan, Taiwan 110, Taiwan
Thailand	Mastercard (Thailand) Limited	105 558 076 584	1 Q House Lumpini Building, 16th Floor, Unit 1601, South Sathorn Road, Khwaeng Thungmahamek, Khet
	Thailand Branch of Mastercard Asia/Pacific Pte. Ltd.	100 538 031 378	Q House Lumpini Building Unit 1601, 16th Fl, 1 South Sathorn Road, Kwaeng Thungmahamek, Khet
Uzbekistan	Uzbekistan Rep office of Mastercard Europe SA	11001148595	7, Mustakillik Street, Mirzo-Ulugbek District, 100000, Tashkent, Uzbekistan, Uzbekistan
Vietnam	Vietnam Representative Office of Mastercard Asia/Pacific Pte. Ltd.	License No. 113/GP-NHNN	Ho Chi Minh City, Viet Nam,
	Mastercard Asia/Pacific Pte. Ltd. Representative Office in Hanoi	License No.: 102/GP.HAN-TTGS2	28A Tran Hung Dao, Phan Chu Trinh ward, Hoan Kiem District, Hanoi, Vietnam
FOR MIDDLE EAST & AFRICA:			
Country	**Mastercard BCRs Entity**	**Registration Number**	**Contact Details**
Bahrain	Bahrain Representative Office of Mastercard Singapore Holding Pte. Ltd	103106-1	904, 001 Building, 365 Street, 316 Block, Manama Center, Bahrain, Manama Center, Bahrain
Ivory Coast	Cote d'Ivoire, Abidjan, Rep Office of Mastercard Singapore Holding Pte Ltd	CI-ABJ-2017- B-6983	c/o Regus Abidjan, XL Plateau Centre, 6 floor, Unit 602, Corner of Dr. Crozet St., and Boulevard de la Republique, Plateau 01 BP 2785, Abidjan, Cote D'Ivoire
Egypt	Egypt Representative Office of Mastercard Middle East, Inc.	1016	13 Al Themar St., 10th Floor, Mohadessin, Cairo, Egypt

	Mastercard Egypt LLC	1976	Nile City Towers, North Tower, 16th Floor, 2005C Corniche El Nil, Cairo, Egypt
Ghana	Mastercard Ghana Limited	CS155212020	5TH FLOOR VIVO PLACE, CANTONMENTS, Rangoon St; P. O. BOX MB 595, Accra, Ghana
Jordan	Mastercard Asia/Pacific Pte. Limited/Jordan	44389	Business Park Development Zone/Amman, 26 Temp, 2 Alkursi, Gh 02, Third Floor - Office No. 3, Amman, Jordan
Kenya	Mastercard East Africa Limited	CPR/2011/5565 0	The Promenade, 5th floor, General Mathenge Drive, Westlands, P.P. BOX 2194-00606, Nairobi, Nairobi, Kenya
	Mastercard Labs Kenya Limited	CPR/2015/1742 95	-The Promenade, 5th floor, General Mathenge Drive, Westlands, P.O BOX 2194 – 00606, Nairobi, Nairobi, Kenya
Mauritius	Mastercard (Mauritius) Limited	190279	5th Floor Ebene Esplanade, 24 Bank Street, Cybercity, Ebene, Mauritius
Morocco	Morocco Branch of Mastercard Africa, Inc.	147505	Tour Crystal 1, 12th Floor, Boulevard Sidi Mohammed Ben Abdellah, Quartier Casablanca Marina
Nigeria	Mastercard Services Sub-Saharan Africa Limited	RC 1384603	7th Floor, Alliance Place, 33A Alfred Rewane Road, Ikoyi, Lagos, Nigeria
	Mastercard West Africa Limited	RC 889080	7th floor, Alliance place, 33A, Alfred Rewane road, Ikoyi, Lagos, Nigeria
	NYBER Nigeria Limited	1055739	Flat 3, block 34 Maryland Housing Estate, Maryland, Lagos State, Nigeria
	Trans-Fast Remittances Ltd.	1382856	Block 34, Maryland Housing Estate, Maryland Ikeja,Lagos Nigeria
Pakistan	Mastercard Pakistan (Private) Limited	0098089	JurisPK, C-5, Block No. 4, Clifton, Karachi, Pakistan, Pakistan
	Pakistan Rep Liaison office of Mastercard Transaction Services (US) LLC	114021	112 & 113, 1 Floor, Bahria Complex-III, M.T., Khan road, Karachi,

			Pakistan
Qatar	Mastercard Gulf LLC	QFC No. 00160	Al Fardan Office Tower, Office No. 2, 16th Floor, AlFardan Office Towers, West Bay, P.O. Box 21491, Doha, Qatar
Saudi Arabia	Saudi Arabia Branch of Mastercard Middle East, Inc.	1010192854	King Fahad Road, Al-Olaya Dist. Hamad Tower, Unit 301, P.O. Box 66749, Riyadh, Saudi Arabia 12212,
	Mastercard Arabia for Information Technology Co. Ltd.	201008183	2886 Northern Ring Rd, 6332 Al Aqeeq Dist.,Riyadh, Saudi Arabia 13511, Saudi Arabia
	(Saudi Arabia) Branch of Mastercard Transaction Services (US) LLC	41010949495	Suite 442, 4th Floor, Regus Hamad Tower, King Fahd Branch Rd, Al Olaya, Riyadh, Saudi Arabia 12212, Saudi Arabia
Senegal	Mastercard Dakar Bureau de Representation (rep office of Mastercard Singapore Holding Pte. Ltd.)	201008183D	SIA Building, 1st Floor, Route de Ngor,Les Almadies, Dakar Senegal
	Trans-Fast SAU	SN-DKR-2009-B-20224	Lot 30-C1, Sotrac Route de Ngor, Les Almadies 1st Floor SIA Building, Route de Ngor, Les Almadies 1st Floor SIA Building, Mermoz,Dakar, Senegal, Senegal
	Mastercard Transaction Services (Senegal) SAU	SN-DKR-2009-B-20224	Route de Ngor, Les Almadies 1st Floor SIA Building,Dakar, Senegal 10200, Senegal
South Africa	Mastercard Southern Africa (Pty) Ltd	2011/006482/07	2nd Floor, 23 Melrose Arch Boulevard, Melrose Arch, JOHANNESBURG, 2196, South Africa
Uganda	Orion Payment Solutions Limited	80034479903090	4TH FLOOR RWENZORI TOWERS, PLOT 6 NAKASERO ROAD, KAMPALA, Uganda, Uganda
United Arab Emirates	Mastercard Middle East Africa FZ-LLC	20564	FL1-Offices, 1 st Floor, Building MasterCard, Dubai, United Arab Emirates, United Arab Emirates

	Mastercard Transaction Services FZ-LLC	20624	FL1-FL2-FL3, Mastercard Building, Al Falak Street, P.O. Box 502093, Dubai Dubai, United Arab Emirates
	UAE Branch Office of Mastercard Transaction Services (US) LLC	11179	Leased Office Bldg Office No. 21, Hamriyah Free Zone – Sharjah, United Arab Emirates, United Arab, United Arab
Zimbabwe	Mastercard Zimbabwe (Private) Limited	13377/2019	1st Floor, Suite L, Sam Lavy's Village, Corner Piers & Borrowdale Road, Borrowdale, Harare, Zimbabwe,-Zimbabwe
FOR LATIN AMERICA			
Country	**Mastercard BCRs Entity**	**Registration Number**	**Contact Details**
Argentina	Argentina Branch of Mastercard Mercosur, Inc	30-689904390	Olga Cossettini, #771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
	Mastercard Cono Sur S.R.L.	1776014	Edificio Porteno 1, Olga Cossenttini 771 2nd Floor, Buenos Aires, Argentina
	Latarg Holding S.R.L.	30717183467	Maipú 1300, 11th Floor, Buenos Aires, Argentina
Brazil	Access Prepaid Brasil Servicos de Cartoes S.A.	35.300.389.859	Bernadino de Campos 318, 6° andar, Brooklin, Sao Paulo, CEP 04621-0, Brazil
	Brasil Branch of Mastercard Brasil Solucoes de Pagamento Ltda.	05.577.343/000 2-18	SH/SUL Quadra 06, Conjunto A, Bloco 6, Sala 611, Centro Empresarial Brasil 21, Brasilia, 70.316-000, Brazil
	Mastercard Brasil Ltda.	CNPJ/MF 01.248.201/0001/ 75	Centro Empresarial Nacoes Unidas, Av. Das Nacoes Unidas 14.171, 20th Andar, Torre C - Crystal Tower, 0479-000, Brazil
	Mastercard Brasil Participacoes Ltda.	23.529.362/0001-70	Avenida das Nações Unidas, 14.171, Crystal Tower, 19º andar, São Paulo, 04794-000, Brazil
	Mastercard Brasil Soluções de Pagamento Ltda.	São Paulo Junta Comercial 150179/03-0	Condomínio Rochaverá, Av. Das Nacoes Unidas 14.171. 20th Andar, Torre

			C – Crystal Tower, Sao Paulo, Brazil
	Zargoje Participações Ltda.	21.793.694/0001-31	Naçoes Unidas Av., 14.171, 20o floor, Crystal Tower, São Paulo/SP, 04794-000, Brazil
	Truata Privacy Tech Brasil Limitada	42.355.178/0001-03	Rua Dom Jose de Barros, n 177, Conj.801-Parte, 8th Floor, Center,Sao Paulo, Brazil 01.038-901, Brazil
	Mastercard Brasil Ltda.	CNPJ/MF 01.248.201/0001/75"	Centro Empresarial Nacoes Unidas, Av. Das Nacoes Unidas 14.171, 20th Andar, Torre C - Crystal Tower, Sao Paulo, 0479-000, Brazil
Chile	Chile Representative Office of Mastercard International Incorporated	3998/93	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
	Mastercard International Incorporated Chile Limitada	17658	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
Colombia	Colombia Branch of Mastercard Colombia, Inc.	640275	Santa Fe, Bogota, Colombia
	Mastercard Colombia Administradora S.A.	02735104	Carrera 11 No. 84-09 Entrada Norte, Piso 8 Oficina 801, Bogota, Colombia
	Arcus FI S.A.S	901.389.502-4	CI 70 No.7 60 of 302, Bogota, Colombia
Costa Rica	Mastercard Costa Rica Billing Services S.R.L.	3-102-789914	Sexto Piso De Torre Lexus, Oficina Numero Ae, Sobre La Calle Marginal, De La Ruta Nacional Numero Veintisiete, San Jose-Escazu San Rafael, Costa Rica
	Mastercard Costa Rica, S.R.L	3-102-607815	Torre Lexus, Piso 6, Avenida Escazú, San Rafael de Escazú, San Jose, Costa Rica, Costa
Dominican Republic	Mastercard Republica Dominicana, SRL	1-31-36908-1	Rafael Augusto Sanchez No. 86, Torre Empresarial: Roble corporate center, Piso 7, Piantini, Santo Domingo, Dominican Republic
	Optimización de Recursos Regalii Dominicana SRL	123120SD	Victor Garrido Puello No. 148, Distrito Nacional, Dominican Republic

Ecuador	Ecuador Branch of Mastercard Ecuador, Inc.	1792163846001	Av. 6 de Diciembre y Luis Cordero, Edif. Novus, Ofic. 401, Quito Ecuador
Guatemala	Mastercard Guatemala Servicios Limitada		Septima Avenida 5-10, Centro Financiero Torre I, Nivel 16, Ciudad de Guatemala, Guatemala
Jamaica	Jamaica Branch Office of Mastercard Latin America Holdings, Inc.	1943 (Overseas)	Panjam building, Ninth floor, 60 Knutsford boulevard, Kingston 5, Kingston, Jamaica
Mexico	IfOnly Mexico S.A.P. I de CV	551276-1	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, Mexico 06600, CDMX,
	Mastercard Mexico Billing Services, S. de R.L. de C.V.	492297	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez,Del Cuauhtémoc, 06600, Mexico
	Mastercard Mexico, S. de R.L. de C. V.	332409-BIS	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez,Del Cuauhtémoc, 06600, Mexico
	Mexico Representative Office of Mastercard International Incorporated	N/a	Av. Paseo de la Reforrma No. 250, Torre A Piso 22, Col. Juárez,Del Cuauhtémoc, 06600, Mexico
	Arcus F.I. S.A de C.V.	N-2018065707	Coahuila, City of Saltillo, Mexico
	Optimización de Recursos Regalii S. de R.L. DE C.V	1296*7	Calle Turin 315, Colonia Villa Olímpica Oriente, Coahuila, Saltillo 25230, Mexico
	Mastercard Transaction Services LAC, S. de R.L R.L. de C.V.	N-2017040165 N-2017040165	Av. Las Americas 187, 1 Las Americas Morelia, Morelia Michoacan, CP 58270, Mexico
Panama	Mastercard Panama S. de R.L.	929481	Urbanizacion Costa del Este, Avenida a Rotonda, Edificio Prime Time Tower, Piso 6, Corregimiento de Juan Diaz, Panama City, Panama
Paraguay	Mastercard Paraguay S.R.L.	1077	AVENIDA BRASILIA 707, CASI SIRIA, ASUNCIÓN, Paraguay

Peru	Peru Branch of Mastercard Peru, Inc.	11175092	Avenida El Derby 055, Torre 1, 5th Floor, Oficina 501, Edificio Cronos, Santiago de Surco, Lima, Peru 27, Peru
Trinidad And Tobago	Trinidad and Tobago branch of Mastercard Latin America Holdings, Inc.	E2021012003821	2000 Purchase Street, Purchase, New York 10577, United States
Uruguay	Mastercard Uruguay Limitada	22353	Clemente PRADINES 1795, Montevideo, Uruguay 11500, Uruguay
Venezuela	Venezuela Branch of Mastercard Spain Holdings, S.L.	221-38685	Calle Madrid entre Trinidad y Mucuchies, Torre Centro Financiero Madrid, piso 9, Urb. Las Mercedes. Municipio Baruta, Caracas, Venezuela
	Venezuela Branch of Mastercard Venezuela, Inc.	16, vol. 57-A-4th	Calle Madrid entre Trinidad y Mucuchies, Torre Centro Financiero Madrid, piso 9, Urb. Las Mercedes. Municipio Baruta, Caracas, Venezuela

The Privacy & Data Protection Team will assess on a case-by-case basis the data transfer practices of any newly acquired companies that have not yet signed Mastercard's Intra-group Agreement and implement appropriate interim data transfer solutions, including contractual guarantees.

Appendix 2 Glossary

Account Servicing Payment Services Provider ('ASPSP') – means the entity that provides a payment account for an Individual and which permit payments initiated by TPPs and/or make the Individual's account transaction data available to TPPs.

Account Information Service – means an online service to provide consolidated information on one or more payment accounts held by an Individual with either another payment service provider or with more than one payment service provider.

Applicable Law – means any laws, ordinances, constitutions, regulations, statutes, treaties, rules, principles of common law or other statutory requirements applicable to Mastercard BCRs Entities.
Data Controller – means any Public Entity, and any private natural or legal person, that specify the purpose and manner of Processing of Personal Data, whether they process the data themselves or through the Data Processor.

Data Processor – means any Public Entity, and any private natural or legal person, that Process Personal information for the benefit and on behalf of the Data Controller.

Data Protection Authority or DPA – means the independent public authority supervising compliance with privacy and data protection legislation.

Employee – means past, present and prospective employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard.

KSA – means the Kingdom of Saudi Arabia.

KSA Personal Data Protection Law (PDPL) – means the PDPL together with its Implementing Regulations including the Regulation on Personal information Transfer outside the Kingdom and any other Legal instrument issued pursuant to the PDPL**.**

Individual – means an identified or identifiable natural person to whom the Personal information pertains.

Intra-group Agreement – means the intra-group agreement that binds Mastercard BCRs Entities to the BCRs.

Mastercard – means the Mastercard Group composed of Mastercard International Incorporated, Mastercard Europe SA, their subsidiaries and affiliates.

Mastercard BCRs Entity(ies) – means the Mastercard entities that are bound by the BCRs and have duly executed the Intra-group Agreement (listed in Appendix 1).

Mastercard Rules – the Rules for the Mastercard, Maestro and Cirrus brands, as available at http://www.mastercard.com/us/merchant/pdf/BM-Entire_Manual_public.pdf.

Mastercard Staff – Employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard and who are bound by the BCRs.

Payment Initiation Service – means a service to initiate a payment order at the request of an Individual with respect to a payment account held at another payment service provider.

Personal information Breach – means any incident leading to the disclosure, destruction, or unauthorised access to Personal Data, whether intentional or accidental, and by any means, whether automated or manual.

PDPL – means the KSA Personal information Protection Law (implemented by Royal Decree M/19 of 9/2/1443 H (corresponding to 17 September 2021) approving Resolution No.98 dated 14 September 2021, as amended by Royal Decree No. M/148 dated 5/9/1444H (corresponding to 27 March 2023)) issued by Royal

Decree No. (M/19) dated 9/2/1443 AH and amended by Royal Decree No. (M/148) dated 5/9/1444 AH and its implementing Regulations, Rules and Policies which include but are not limited to the Implementing Regulation of the Data Protection Law, Regulation on Personal Data Transfer Outside the Kingdom, Rules for Appointing Personal Data Protection Officer, Elaboration and Developing Privacy Policy Guideline, Minimum Personal Data Determination Guideline, the Rules Governing the National Register of Controllers within the Kingdom, Guidelines for Binding Common Rules (BCR) For Personal Data Transfer, Standard Contractual Clauses For Personal Data Transfer, Personal Data Destruction, Anonymization, and Pseudonymisation Guideline, Personal Data Processing Activities Records Guideline, Personal Data Breach Incidents Procedural Guide, Rules for Appointing Personal Data Protection Officer.

Personal information – means any data – whatever its source or form – that leads to recognising an Individual specifically or makes it possible to identify the Individual directly or indirectly, including: the name, personal identification number, addresses, contact numbers, licence numbers, records and personal property, bank account and credit card numbers, still or moving images of the individual and other data of a personal nature.

Processing – means any process performed on Personal Information by any means, whether manual or automated, including the processes of collecting, recording, archiving, indexing, arranging, formatting, storing, modifying, updating, merging, retrieving, using, disclosing, transferring, publishing, data sharing or interconnecting, blocking, erasing and destroying.

Public Entity – means any ministry, department, public institution or public authority, or any independent public entity in the KSA, or any of its affiliated entities.

Sensitive Data – means any Personal information revealing racial or ethnic origin, or religious, intellectual or political belief, data relating to security criminal convictions and offenses, biometric or Genetic Data for the purpose of identifying the person, Health Data, and data that indicates that one or both of the individual's parents are unknown.

Sub-Processor – means the entity engaged by the Data Processor or any further sub-contractor to process Personal information on behalf of and under the instructions of the Data Controller.

Third Party Provider ('TPP') – means the legal or natural person that provides account initiation services or payment initiation services to an Individual.