

GDPR (General Data Protection Regulation) - effective 25th of May, 2018

Data protection measurements:

As previously communicated, ACI Worldwide has been hard at work implementing its compliance program for the General Data Protection Regulation (GDPR) data protection. The PAY.ON Payments Gateway will not apply any data masking to personal data showing up in BIP transaction view or when searching transactions in BIP as this is business critical to the day-to-day work for many non-administrative user roles such as Call Center or Accounting Global. However applying data masking to any personal data in the BIP transaction logs will continue to stay in place by design as of 25th of May. Any such personal data that could lead in identifying an individual will be masked in all the application logs. This is part of the changes ACI are implementing to protect personal data at rest and ensure compliance with the GDPR's "right to be forgotten". Any such data in the transaction log that relates to or can be used to identify a person in any way is masked in a similarly to how we mask credit card numbers. No change is expected to how we mask credit card numbers as this stands under PCI regulation.

Please see below typical customer request scenarios:

- 1. Search requests: Search for, and copy, all information stored about an individual and paste this into a commonly used readable format (i.e. excel).** ACI receives a request from a customer that says that an end user has requested access to data we have stored on them, and this includes data processed by your solution. End user (ACI customer's customer) identity is verified and ACI is clear to collect the information and send it back to the customer or requestor. Can ACI find and copy End User personal data in your solution?
 - ACI PAY.ON Payments Gateway offers to the merchant the possibility to perform transaction personal data export within BIP (Business Intelligence Platform) user interface. The BIP transaction data search period is limited to the last 14 months duration period but the search can be executed for one month period maximum at a time. The merchant would have to perform the transaction searches and exports in batches and compile final transaction data to the shopper. The outcome of an individual transaction export is a CSV file and all transaction customer data will stay unmasked. The transaction export is offered to the merchant as a self service.
- 2. Modify / change / correct at request all personal data stored and further processed by the solution.** ACI receives a request from a customer who has requested to make an update to the personal data processed by your solution. Their identity is verified and the new personal data supplied, can ACI update their personal data in your solution?
 - ACI PAY.ON Payments Gateway will continue to retain personal data as per the customer contractual obligations and PCI regulations. However if the customer would like to proceed with the shopper request to have data deleted then this can be requested by the customer through an ACI HELP24 ticket.
- 3. Delete at request all personal data stored and further processed by the solution within, taking into account restrictions in place by superseding laws.** ACI receives a request from customer that an End user has asked for their personal data to be deleted from our systems. Customer has verified their identity and approved that personal data can be deleted. They have contacted ACI to ask that you remove the individual's data from your solution. How does ACI handle this?
 - ACI PAY.ON Payment Gateways will continue to retain personal data as per the customer contractual obligations and PCI regulations. However if the customer would like to proceed with the shopper request to have data deleted then this can be requested by the customer through an ACI HELP24 ticket.
- 4. Delete personal data once it has fulfilled the purpose it was originally collected for ACI Record retention schedule OR Provisions in the customer contract.**
 - ACI PAY.ON Payment Gateways will continue to retain personal data as per the customer contractual obligations and PCI regulations.
- 5. Freeze / pause / halt at request all personal data stored and further processed by the solution.** End user has taken legal action against Customer. As part of the legal action, their lawyers have instructed Customer to pause all processing of the customer's personal data until the legal action is concluded. Can ACI solution pause the processing of this customer's personal data?
 - There is no personal data that is further processed by the PAY.ON Payments Gateway. If the end user has taken legal action against his/her customer then the customer should not allow future transaction processing towards PAY.ON Payments Gateway.

In case the customer requests personal data to be deleted from the transactions then the following information is mandatory to be provided to ACI HELP24:

1. Channel entity id
2. Shopper email address OR/AND set of merchant order IDs (i.e. merchantTransactionId) OR/AND set of transactions UUIDs

ACI HELP24 will proceed with analyzing the ticket request and come back to the customer with a set of transactions UUIDs found to delete personal data from so that we have a final confirmation. Once confirmed by the customer, ACI HELP24 will proceed in resolving the ticket. Before confirming, the customer should know that:

- Once personal data is deleted from the transactions, they should never refer back to these transactions
- Personal data coming to us from the banks in the connector details will stay untouched due to business reasons
- Credit card numbers will not get removed and will continue to stay protected as per PCI regulations
- For some alternative payment methods such as PAYPAL, email addresses in the account number will stay untouched due to business reasons
- Everything else will get deleted within the confirmed set of transactions, the transactions themselves will not get deleted