Privacy Notice for VISA Click to Pay

Date : 19.11.2026

1. What's Click to Pay

In addition to Banqup privacy policy, the following privacy notice applies for the Click to Pay service for VISA cards issued or enabled by Banqup SA.

Click to Pay is a payment option available in online merchant checkout if the merchant provides Click to Pay. Click to Pay is a feature of your card similar to contactless.

To use Click to Pay, you will undergo cardholder verification, select your card, authorize, and the transaction is complete. This is applicable across any device you are using for an online purchase and provides a frictionless checkout experience.

If you no longer want to use Click to Pay, you can opt out from Click to Pay in card settings by removing the card from Click to Pay. You can always opt in again to Click to Pay when desired.

This service is not intended for vulnerable individuals, specifically minors under 18 years of age and individuals under legal guardianship. Consequently, clients managed by caretakers as well as individuals below the age of 18 are explicitly excluded from using the service.

2. Responsibility for Your Personal Data (information on the allocation of responsibilities between Banqup SA and Visa as joint controllers).

Banqup activates your card in Visa Click to Pay to enable a streamlined online checkout experience. Banqup provides your enrollment information to Visa, and Visa maintains your Visa Click to Pay profile. When you shop online, Visa will verify you, present your cards and (where appropriate) share your information with the Merchant to enable a frictionless checkout.

Banqup SA and Visa are jointly responsible for the protection of your personal information in relation to Visa Click to Pay. The parties have entered an arrangement to determine their respective responsibilities. This concerns in particular the exercise of your rights and the obligation to provide you with information on the processing of your personal information.

Under this arrangement, Banqup SA is responsible for collecting your personal information, transmitting it to Visa and keeping it up to date, making decisions on and exercising your opt-out options, as applicable. Banqup SA is also responsible for providing you with the information required and acts as the contact point for your queries and requests.

Visa is responsible for storing your personal information in Visa's Click to Pay database, operating the database, performing verification (including by One Time Passcodes), displaying your masked cards and ultimately, where you select a card at checkout, providing your information to the Merchant to enable the transaction.

In the European region, the Joint Controller Arrangement is implemented in accordance with Articles 13, 14 and 26 of the General Data Protection Regulation (GDPR). This applies in particular to the protection of personal information, the exercise of your rights, and the obligation to inform you on the processing of personal information. Banqup SA is your point of contact for GDPR requests (gdpr@banqup.com).

3. Which Personal Data is Collected and Used?

Your personal data is used

- To provide the Click to Pay checkout service itself, to create your profile and to route your payment details to the merchant to execute online purchase. The lawful basis for the processing is necessary for the performance of a contract.
- To prevent fraud, perform identity verification check (sending a one time passcode) and business reporting. The lawful basis for this processing is our legitimate interest, namely preventing financial fraud, validating

consumer identity through One-Time Passcodes (OTP), and enhancing the overall security of digital commerce.

4. Purpose and Lawful Basis for the Processing of Personal Data

Your personal data is used

- To provide the Click to Pay checkout service itself, to create your profile and to route your payment details to the merchant to execute online purchase. The lawful basis for the processing is necessary for the performance of a contract.
- To prevent fraud, perform identity verification check (sending a one time passcode) and business reporting. The lawful basis for this processing is our legitimate interest, namely preventing financial fraud, validating consumer identity through One-Time Passcodes (OTP), and enhancing the overall security of digital commerce.

5. Recipients of Personal Data

To enable Click to Pay and transactions, we and Visa share your name, email, phone number, address, card details and other relevant information with the merchant, other participants in the payment transaction and other card systems that participate in the Click to Pay solution.

6. International Transfers

Visa will process personal data in the United States in maintaining your Click to Pay profile. Visa uses approved Standard Contractual Clauses and other appropriate measures to assure that personal data is adequately protected when it is transferred out of the EEA, the UK, or Switzerland to countries without the same standards for data protection. Visa will assure that any transfer of personal data outside the EEA, Switzerland and/or the UK continues to be safeguarded in accordance with applicable data protection laws.

7. Retention

Your personal information is kept for as long as needed for the purposes mentioned above and for any additional period that may be required or permitted by law. If you wish to request deletion of your personal information, please contact Banqup SA at gdpr@banqup.com.

8. Information about your privacy rights and how to contact us

Banqup is your contact point if you want further information on how your personal information is processed in connection with Click to Pay.

In the Banqup privacy notice you will find information about your privacy rights, contact information to Banqup Data protection Officer, as well as information about the right to lodge a complaint with the local data protection authority.

Visa Europe Limited, whose registered company number is 05139966, can be contacted by email at privacy@visa.com or by writing to Global Privacy Office, Visa Europe Limited, 1 Sheldon Square, London, W2 6TT, United Kingdom and. For full information on how Visa uses your data, please refer to the Visa Global Privacy Notice available here.