



**ENTRUST**

**DIGITAL CARD SOLUTION**

PRODUCT PRIVACY NOTICE

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# Digital Card Solution Product Privacy Notice

Last updated: May 8, 2024

## Digital Card Solution (DCS)

This product privacy notice describes how Digital Card Solution collects and processes personal data pursuant to applicable data privacy laws.

## Description

Digital Card Solution combines several different product offerings into a single software development kit (SDK) and/or through a set of application programming interfaces (APIs) to provide a digital card solution to customers.

## Personal Data Collection and Processing

Solution	Mandatory/ Optional	Personal Data Type	Purpose for Processing
All	Mandatory	Username/log-in id; audit trails for back-office activities	Customer employee's data is processed in order to manage their access to the Digital Card Solution back-office website.
All	Optional	First and last name	Customer employee's data is processed in order to manage their access to the Digital Card Solution back-office website. Name of the users can be replaced by ID in the back-office interface upon request.
NFC Issuer Wallet	Mandatory	Card primary account number; mobile advertising identifier (IDFA/AAID)	End user data is processed only in order to enable in-store card payments using Digital Card Solution mobile

			applications and to give customer and end users access to their transaction history.
NFC Issuer Wallet	Optional	Cardholder phone number	End user data is processed only in order to enable in-store card payments using Digital Card Solution mobile applications and to give customer and end users access to their transaction history.
Issuer TSP Hub	Mandatory	Card primary account number	End user data is processed only in order to manage digitalization of cards and digitalized card lifecycle using Digital Card Solution applications.
Issuer TSP Hub	Optional	Cardholder name	End user data is processed only in order to manage digitalization of cards and digitalized card lifecycle using Digital Card Solution mobile applications.
Token Manager	Mandatory	Card primary account number	End user data is processed only in order to enable push provisioning of cards using Digital Card Solution applications.
Token Manager	Optional	Cardholder name	End user data is processed only in order to enable push provisioning of cards using Digital Card Solution applications.

SCA/Secure Interface	Mandatory	Mobile advertising identifier (IDFA/AAID)	End user data is processed only in order to enable strong authentication and secure interface features using Digital Card Solution mobile applications.
SCA/Secure Interface	Optional	Card primary account number; cardholder phone number; PIN code number	End user data is processed only in order to enable strong authentication and secure interface features using Digital Card Solution mobile applications.
X-Pay Push Provisioning	Mandatory	Primary account number; first and last name	This information is required by the third-party wallet to push the card to the wallet.
Transactions Control	Mandatory	Primary account number	This information is required by the third-party service providers to provide the Transaction Control service.
Card Management	Mandatory	Primary account number	This information is required by the third-party service providers to provide the Card Management service.
Dynamic Virtual Card Numbers	Mandatory	Primary account number	This information is required by the third-party service providers to provide the Dynamic Virtual Card Number service.

## Retention Period

Personal data associated with the wallet and digitalized cards is retained until closure of the contract with the customer unless a different, explicit retention period is required by the customer and negotiated with Digital Card Solution. Logs are retained for 12 months to comply with PCI-DSS requirements, but logs do not contain PII.

Back office personal data is retained for one year unless a different, explicit retention period is required by the customer and negotiated with Digital Card Solution.

Audit records in the Digital Card Solution SIEM are kept for security and monitoring purposes and are retained for a year at a minimum. That retention period can be extended if required by the customer and negotiated with Digital Card Solution.

## Use of Sub-Processors

For the current list of sub-processors, visit <https://www.entrust.com/legal-compliance/data-privacy/sub-processors>.

## International Data Transfers

All customer personal data processed by Digital Card Solution in its role as a data processor is housed on servers residing in Ireland or the United States and maintained by AWS. To the extent that Customers are located in a different country, there may be cross-border transfers of personal data. Entrust makes cross-border transfers of personal data in accordance with relevant data privacy law requirements (e.g., European Commission approved Standard Contractual Clauses (and/or their UK and Switzerland equivalents) if they are not in a country that has the benefit of an [adequacy decision](#)).

## Data Protection Measures

For more information on how Entrust processes personal data collected by this product, please refer to Schedule 2 Annex II to the Standard Contractual Clauses of our standard customer data processing addendum (DPA) found [here](#).

## Data Privacy Rights

The Customer is the controller for all personal data processed by Entrust for the purpose of providing Digital Card Solution. Entrust Corporation, as the processor/service provider, will assist the Customer, to the extent reasonable and practicable, in responding to data subject requests the Customer receives with respect to Digital Card Solution.

## Amendments to this Privacy Statement

Entrust reserves the right to amend this product privacy notice from time to time as our business, laws, regulations and industry standards evolve. Any changes are effective immediately following the

posting of such changes to <https://www.entrust.com/legal-compliance/product-privacy>. We encourage you to review this statement from time to time to stay informed.

## Contact Information

For questions about this product privacy notice, please contact [privacy@entrust.com](mailto:privacy@entrust.com). For Entrust Corporation's general privacy notice, please click [here](#).