



# Information Security Policy & Procedure

Policy ID: SWIS-GDPR-006

Policy Name: Website and Mobile Application Privacy Policy

## Important notice

All information contained in this documentation, as well as the software described in it, is proprietary to Iraq Electronic Gate for Financial Services. Except as permitted by license agreement, no part of this documentation may be reproduced, stored in a retrieval system, or transmitted in any form or by electronic, mechanical, recording, or any other means, without the prior written permission to Iraq Electronic Gate for Financial Services.

Iraq Electronic Gate for Financial Services has taken care in the preparation of this document but makes no expressed or implied warranty of any kind and assumes no responsibility for errors or omissions. No liability is assumed for incidental or consequential damages in connection with or arising out of the use of the information or programs contained herein Iraq Electronic Gate for Financial Services reserves the right to introduce changes to the product that are not reflected in the documentation.

## 1 Table of Contents

1	Table of Contents.....	2
2	Introduction .....	3
3	Who We Are?.....	3
4	How We Use Your Information .....	4
5	When You Use Our Website .....	4
6	When You Use Our Mobile Application.....	5
7	When You Submit An Enquiry Via Our Website .....	6
7.1	Your Rights As a Data Subject .....	7
7.2	Your Right To Complain.....	7
7.3	Updates To This Privacy Policy .....	8

## 2 Introduction

This privacy policy tells you about the information we collect from you when you use our website. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

## 3 Who We Are?

***Iraq E-Gate for Financial Services Co.*** is an Iraqi company registered in Iraq and was granted license as a Financial Electronic Payment Company, under License No. 4 per the Central Bank Law No. 56 of year 2004 and the Electronic Payment System No.3 of 2014.

Per the scope of the granted license, Iraq E-Gate is permitted to conduct the following activities:

- a. Acquisition of Merchants.
- b. Acquisition of ATMs.
- c. Acquisition of Manual Cash Disbursements.
- d. E-commerce Acquisition.
- e. Issuance of Local and International Prepaid Cards.
- f. Facilitation of Electronic Bill Payments.
- g. Bank Services.
- h. Other Value – Added Services.

The company handles its work from its location in Baghdad/Jadreja and managed by professional staff specialized technically, commercially and financially in the field of electronic payment and technology systems working day and night to put the best international practices of electronic payment with safety in the hands of the Iraqi citizen and under his control.

- a. **Data Protection Officer (DPO)**. Details of *Iraq E – Gate for Financial Services’* Data Protection Officer are as under: -

Item	Description
Name	Ali Azam Habeeb
Contact Number	+9647834400525
Email	dpo@switch.com.iq

## 4 How We Use Your Information

- a. When you use our website.
- b. When you submit an enquiry via our website.
- c. When you purchase a product from our website.
- d. Other types of transactions via our website.
- e. Your rights as a data subject.
- f. Your right to complain.
- g. Updates to this privacy policy.

## 5 When You Use Our Website

When you use our website to browse our products and portal services and view the information, we make available, a number of cookies are used by us: -

- a. To allow the website to function.
- b. To collect useful information about visitors.
- c. To help to make your user experience better.

Complete detail of cookies for *Iraq E – Gate for Financial Services’* Website and Portal is as follows: -

## Details for Session CF67C9CCAAA1FC0ABE0E231B82D00BF8

**Session Id** CF67C9CCAAA1FC0ABE0E231B82D00BF8  
**Guessed Locale**  
**Guessed User** AGENT  
**Creation Time** 2021-01-20 12:14:17  
**Last Accessed Time** 2021-01-20 12:14:28  
**Session Max Inactive Interval** 00:15:00  
**Used Time** 00:00:11  
**Inactive Time** 00:00:08  
**TTL** 00:14:51

[Refresh](#)

25 ATTRIBUTES

Remove Attribute	Attribute name	Attribute value
<a href="#">Remove</a>	refresh_distrib	YES
<a href="#">Remove</a>	loginBean	ma.net.s2m.portal.egate.beans.LoginBean@4cab6642
<a href="#">Remove</a>	refresh_trs	YES
<a href="#">Remove</a>	my_style	style.css
<a href="#">Remove</a>	login	AGENT
<a href="#">Remove</a>	refresh_page	YES
<a href="#">Remove</a>	org.ajax4jsf.application.AjaxStateManager.view_sequence	2
<a href="#">Remove</a>	my_cpr_list	
<a href="#">Remove</a>	org.ajax4jsf.application.AjaxStateHolder	org.ajax4jsf.application.AjaxStateHolder@5c52bc80
<a href="#">Remove</a>	menuBean	ma.net.s2m.portal.egate.beans.MenuBean@24b56e8
<a href="#">Remove</a>	loop	DEAG
<a href="#">Remove</a>	loop	DEAG
<a href="#">Remove</a>	my_background	default_bg.png
<a href="#">Remove</a>	localeBean	ma.net.s2m.portal.egate.beans.LocaleBean@4cc9ef44
<a href="#">Remove</a>	my_banner	new_header.svg
<a href="#">Remove</a>	menuOptionList	[]
<a href="#">Remove</a>	lang	en
<a href="#">Remove</a>	javax.faces.request.charset	UTF-8
<a href="#">Remove</a>	add_dealer	NEW
<a href="#">Remove</a>	my_color	E_GATE
<a href="#">Remove</a>	my_ban	5201
<a href="#">Remove</a>	moduleList	[M013, M015, M016, M017]
<a href="#">Remove</a>	com.sun.faces.renderkit.ServerSideStateHelper.LogicalViewMap	{-3972967294925299782={-7156651382413049812=[Ljava.lang.Object;@5b4709e9], -3630228748619831461={8319359509320872905=[Ljava.lang.Object;@123808bd}}}
<a href="#">Remove</a>	connected_dealer	389
<a href="#">Remove</a>	name	Marketing Agent
<a href="#">Remove</a>	connected_agent	421

[Return to session list](#)

## 6 When You Use Our Mobile Application

When you use our Mobile Application to Upload KYC Data, browsing our services and view the information, we make available, following information is collected by us: -

- To allow the Mobile Application to function.

- b. To collect KYC information of visitors .
- c. To help to make your user experience better.

Complete detail of personal data collected is as follows: -

- ☒ Name
- ☒ Date of birth
- ☒ Nationality
- ☒ Gender
- ☒ Contact number
- ☒ Address
- ☒ Email address
- ☒ ID Photo
- ☒ Location data (Acquire it but no storage – To find nearest Agent via map)
- ☒ CNIC,

### Special categories of personal data

- ☐ Race
- ☐ Religion
- ☒ Political opinions (Politically Exposed Persons – Gov Employees)
- ☐ Trade union membership
- ☐ Sexual orientation
- ☐ Health information
- ☒ Biometric data (Authentication only – no storage)
- ☐ Genetic data
- ☐ Other (please add)

## 7 When You Submit An Enquiry Via Our Website

When you submit an enquiry via our website, we ask you for your name, contact telephone number and email address, as well as the request details.

We use this information to respond to your query, including providing you with any requested information about our products and services. We may also email you several times after your enquiry in

order to follow up on your interest and ensure that we have answered it to your satisfaction. We will do this based on our legitimate interest in providing accurate information about our services and/or products.

Your enquiry is received as an Email Message and is registered & stored on the Email Server's DB.

Email is received by Iraq E – Gate Call Center and the concerned ones are directed to Data Protection Officer to take further actions as per enquiry. We do not use the information you provide to make any automated decisions that might affect you. We keep enquiry emails for 1 year.

## **7.1 Your Rights As a Data Subject**

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. If we have asked for your consent to process your personal data, you may withdraw that consent at any time.

If we are processing your personal data for reasons of consent or to fulfil a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.

If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased, subject to local law requirements.

You have the right to ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by online form on our website, please use the following form: <https://switch.com.iq/en/contact-us/> .

## **7.2 Your Right To Complain**

If you have a complaint about our use of your information, we will prefer you to contact us directly in the first instance so that we can address your complaint.

### **7.3 Updates To This Privacy Policy**

We regularly review and, if appropriate, update this privacy policy from time to time, and as our services and use of personal data evolves. If we want to make use of your personal data in a way that we have not previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent. We will update the version number and date of this document each time it is changed.