

# Alipay Wallet

## Privacy Notice

(October 2020)

This [Privacy Notice](#) applies to the users of our **Alipay Wallet** and **Alipay Wallet Services (Users)**, i.e. each individual who is a registered member of the AliExpress merchant site and has registered a separate account with Alipay for making online or offline purchases from the AliExpress merchant site and its corresponding mobile application, AliExpress offline stores, or other online or offline merchants using the Alipay Wallet (as defined below).

**Alipay Wallet** and **Alipay Wallet Services** are services provided by Alipay (Europe) Limited S.A., 9, rue du Laboratoire, L-1911 Luxembourg, Grand Duchy of Luxembourg (**Alipay**). Alipay acts as the ‘controller’ under the European Union’s General Data Protection Regulation 2016/679 (**GDPR**) for the processing activities described in this Notice. This is the legal entity deciding why and how information relating to you (**personal information**), also known as ‘personal data’ under the GDPR, are collected and processed. Alipay, directly or through its affiliates (collectively referred to as the **Alipay Group**), facilitates payments in connection with the aforementioned online and offline transactions using the e-wallet function (**Alipay Wallet**) within the AliExpress mobile application (**AliExpress App**).

Unless otherwise indicated or the context requires otherwise, reference to “you” or “your” are intended to refer to a User, and reference to “Alipay”, “we”, “us” or “our” in this Notice are intended to refer to Alipay. Please note that the agreements in relation to our Alipay Wallet and Alipay Wallet Services may however be concluded with or refer to other companies in the Alipay Group that are involved in providing the Alipay Wallet Services (each an “Affiliate” or member of the “Alipay Group”).

Please see [here](#) our terms and conditions for the Alipay Wallet and Alipay Wallet Services, which should be read in conjunction with this Privacy Notice.

We want you to understand:

### **1. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?**

We collect and use personal information from and about you, including when you interact with us, register for an Alipay Wallet account, use the Alipay Wallet to make purchases or otherwise conduct financial transactions, or otherwise visit or use our Alipay Wallet Services. The categories of personal information that we collect include:

- Registration information: your basic personal details, including first and last name, date of birth, identification and any other information as set out in your identity card, passport or other travel document information and your address proof and/or other information from checks, credit cards, bank statements, money orders, contact information (including your address, phone number and email address) and other registration details;
- Financial information (including bank account numbers, billing and delivery information, credit/debit card numbers (including security codes) and cardholder names, expiration dates and bank statements);
- Transaction details (including name, account number, contact information and/or other information relating to you or another recipient of a payment, remittance or fund transfer as well as financial

information about the transaction itself such as amount, currency, type of transaction, source of funds or bank details); and

- Technical information, including:
  - information obtained from the device you use to interact with us (including IP address, geographical location, device identification codes and other features/data that can be used to identify a device), and
  - information from your visits to our websites or mobile sites (including browser/platform type and version, internet service provider, operating system, referral source/exit pages, length of visit/usage, page views and any search term you use, device logs in the event of a crash or error report).
- Communications-related information: the content of emails, transcripts of webchats or phone call recordings when you interact with us, as well as the means of communication used to contact us.

## **2. HOW WE OBTAIN YOUR PERSONAL INFORMATION?**

We collect personal information about you in connection with the Alipay Wallet Services, including when you browse our website, register as a User of Alipay Wallet, log into your Alipay Wallet account to use our Alipay Wallet Services, when you participate in one of our loyalty or promotional events, or when you communicate with us by phone, email, webchat or otherwise.

We also receive personal information about you from other sources, including:

- AliExpress or any other merchants from which you buy goods or services using Alipay Wallet Services;
- Alipay Group companies and other third party suppliers providing services on our behalf;
- banks and other payment institutions that we cooperate with to provide you with the Alipay Wallet Services;
- electronic identity verification service providers;
- credit reference and fraud prevention agencies; and
- publicly available sources.

We combine personal information that we obtain from you with additional data we collect about you from the above sources. Please refer to section [“How we use your personal information?”](#) for more details.

## **3. HOW WE USE YOUR PERSONAL INFORMATION?**

We use the personal information we collect to operate our business, including provision of the Alipay Wallet and the Alipay Wallet Services. We may use your personal information for the following purposes:

- (1) verifying your identity, including during account creation and payment password reset processes;
- (2) verifying your eligibility as a User of the Alipay Wallet (including “know your customer”, anti-money laundering and counter-terrorist financing checks and verifications);

- (3) processing, maintaining and managing your registration as a User of the Alipay Wallet;
- (4) providing you with Alipay Wallet Services and related User services, including operating the Alipay Wallet Services and enabling transactions, customizing your user experience, facilitating the payments, remittances, fund transfers, settlement of purchase price for goods and services, shipping and related services for purchases, charge-backs, refunds, sending notices about transactions, and responding to your queries, feedback, claims or disputes;
- (5) contacting you in relation to our provision of Alipay Wallet Services and other legal purposes, contacting you in connection with any communication preferences or requests you have expressed, asking you for feedback about Alipay Wallet Services or other related products and services;
- (6) collecting feedback from you and your staff about our products and services and using such feedback to improve our business and/or customize products and services for you;
- (7) sending you direct marketing or other information about products and services offered by us, other Alipay Group companies, our business partners such as members of the Alibaba Group or other third parties, including for promotional purposes;
- (8) managing risk, performing creditworthiness and solvency checks, or assessing, detecting, investigating, preventing or remediating fraud, data breaches or other potentially prohibited or illegal activities and otherwise protecting the integrity of our payments platform;
- (9) detecting, investigating, preventing or remediating violations of your agreements with us or any merchant or any applicable policy, industry standards, guidelines, laws and regulations and our policies;
- (10) making disclosures as may be required by any law or regulation, government officials or other third parties, including any card association or other payment network. Disclosures may also be made pursuant to any subpoena, court order or other legal process or requirement applicable to us or any Alipay Group company (including “know your customer”, anti-money laundering and counter-terrorist financing reporting requirements or other commercial disputes);
- (11) making disclosures to third parties including relevant regulators to prevent any harm or financial loss, to report suspected illegal activity or to establish, exercise or defend claims or potential claims on behalf of ourselves or any Alipay Group company;
- (12) enabling any due diligence and other appraisals or evaluations for any actual or proposed merger, acquisition, financing transaction or joint venture;
- (13) conducting research and analysis, or otherwise using data to improve, optimize and expand the product functions of the Alipay Wallet and Alipay Wallet Services, if applicable, to develop related products and services;
- (14) managing our business including to protect Users, prevent harm, fraud or theft to ourselves and others, maintain the security of our products, and protect our rights or property and those of others; and
- (15) otherwise for everyday business purposes, to comply with law, or in other ways for which we provide specific notice at the time of collection.

#### **4. WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

We share your personal information to operate and manage our business, including for the purposes indicated under “[How we use your personal information?](#)”. Categories of recipients to which we transfer data include:

- merchants to whom payments are made using the Alipay Wallet;
- companies in the Alipay Group providing services on our behalf or to which we provide services;
- third parties including any agent, contractor or third party service provider that we work with in providing Alipay Wallet Services. For example, we work with third parties to help us with fraud prevention, anti-money laundering checks, credit checking, bill collection, data entry, database management, promotions, marketing, customer service, technology services, products and services alerts, payment settlement and processing and payment extension services;
- entities with which Alipay maintains commercial arrangements, including online and offline merchants and companies in the Alipay Group or its wider corporate group;
- banks, card associations, payment networks or acquiring institutions, and other entities, including those involved in processing of payments and conducting of transactions through Alipay Wallet Services;
- law enforcement agencies, insurers, government and regulatory authorities or any other organizations to which Alipay, or any Alipay Group company or third party service provider is under an obligation to make disclosure under the requirements of any applicable law, regulation or commercial arrangement;
- individuals and entities involved in any merger, acquisition, corporate reorganization or financing, or similar transaction with us, including in the event of the sale of all or part of our assets; and
- our own and others’ professional advisors (e.g., lawyers, accountants, auditors and trustees).

#### **5. HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?**

We will keep your personal information in accordance with our policies and for as long as it is necessary to comply with our legal and regulatory obligations, provide you with the Alipay Wallet and the Alipay Wallet Services, handle potential legal claims in this respect, evidence our legal basis for processing your personal information and fulfil the other purposes set out in this Notice. This may mean that we need to retain your personal information for a period of time after you cease to be a User.

We use a variety of security measures and technologies designed to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection and privacy laws and regulations. You are responsible for maintaining the security of your account information (username, password, etc.) for Alipay Wallet Services in your possession or control.

For registered users of the Alipay Wallet, your registration and account information (if any) can be viewed and edited in the AliExpress App through your account with us, which is protected by a password. We recommend that you do not divulge your password to anyone. Our staff will never ask you for your password in an unsolicited phone call or in an unsolicited email. If you share a device with others, you should not choose to save your log-in information for the Alipay Wallet (e.g., user ID and password) on that shared device.

## **6. DO WE PROCESS PERSONAL INFORMATION ABOUT CHILDREN?**

As per the Alipay Wallet User Terms and Conditions, our service is not directed towards children under 18 years old nor does Alipay knowingly collect information from children under 18. If you are under 18, please do not use Alipay Wallet Services or submit any personal information to us.

## **7. THIRD PARTY SERVICES AND SITES**

The Alipay Wallet services, the AliExpress App and our website may provide links to other websites, apps and services (including other online merchant sites) for your convenience and information. These services, apps and websites may operate independently from us. Linked services, apps and websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by us, we are not responsible for these websites', apps' or services' content, any use of these services, apps or websites by you, or the privacy practices of these services, apps or websites.

## **8. WHAT IS OUR LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION?**

We use your personal information under the legal bases set out below.

- For the performance of [Alipay Wallet Services Agreement](#) or other contracts to which you are a party or to take pre-contractual steps at your request.
- To comply with legal and regulatory obligations.
- For legitimate interests:
  - to operate and improve our business and minimise any disruption to the Alipay Wallet Services that we may offer to you;
  - to send you service-related communications that Alipay either provides to comply with its legal or regulatory obligations or to perform our services towards you and inform you appropriately about them;
  - to send you marketing/promotional communications and make these communications with you more relevant and personalised to you;
  - to make your experience of our products and services efficient and effective;
  - to transfer your personal information internationally as part of our business structure, including as a result of laws and regulations applicable to us and other Alipay Group companies and legal claims or proceedings that involve us or other Alipay Group companies.

However, in cases in which we wish to use your personal information for our legitimate interests, we carefully consider the position and do not go ahead if we think your interests or fundamental rights and freedoms relating to your personal information would be prejudiced. Examples of matters we consider include how we use your data responsibly (for instance security measures we put in place to protect it, such as access controls).

- Because you have given your consent. At times we may ask for your consent to allow us to use your personal information for one or more purposes (e.g. to send you direct marketing via electronic communication means, when such consent is required under applicable law).

See section “[Your rights with respect to your personal information](#)” for information about the rights that you have if we process your personal information.

## **9. TRANSFERS OF YOUR PERSONAL INFORMATION OUTSIDE OF THE EEA**

We transfer your personal information outside of the European Economic Area (EEA) as permitted by applicable data protection and privacy laws and regulations. Your personal information will be processed by us, companies in the Alipay Group and our trusted third party suppliers outside of the EEA, including in countries where data protection and privacy laws or regulations may not be equivalent to, or as protective as, the data protection and privacy laws and regulations in the EEA.

In accordance with applicable data protection and privacy laws and regulations, we have in place appropriate measures to ensure that your personal information remains protected and secure when it is transferred outside of the EEA to a jurisdiction other than one that is recognised by the European Commission as having an adequate level of protection of personal data. These measures include (where applicable) transferring pursuant to data transfer agreements implementing the standard contractual clauses adopted by the European Commission.

If you would like further information about the above transfers, you can contact us using the details set out in the “[Contact us](#)” section below.

## **10. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION**

In accordance with applicable data protection and privacy laws and regulations, you may be entitled to:

- ask us about the processing of your personal information, including to be provided with a copy of your personal information;
- request the correction and/or (in some cases) deletion of your personal information;
- in some cases, request the restriction of the processing of your personal information, or object to that processing;
- withdraw your consent to the processing of your personal information at any time (where Alipay is processing your personal information based on your consent). Please note that withdrawing your consent may prevent us from further providing all or part of our services to you and will not affect the lawfulness of processing based on consent before its withdrawal;
- request receipt or transmission to another organisation, in a machine-readable form, of the personal information that you have provided to Alipay where we are using your personal information based on consent or performance of a contract; and
- complain to the relevant supervisory authority if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal information.

Where you are given the option to share your personal information with us, you can always choose not to do so. However, if you choose not to share certain personal information with us, it could mean that we are unable to perform the actions necessary to achieve the purposes of processing described (see section “[How we use your personal information?](#)” above) and/or that you are unable to make use of the services and products offered by us. In that case, we will inform you about this.

If you would like to exercise your rights, please contact us using the details set out in the “[Contact us](#)” section below.

## **11. [CONTACT US](#)**

If you have questions or requests about the privacy issues relating to the processing of your personal information, you can contact the privacy office of your data controller, Alipay (Europe) Limited S.A., by email at [AlipayWalletprivacy@alipay.com](mailto:AlipayWalletprivacy@alipay.com) or at our business address: Privacy Matters, 11-13, Boulevard de la Foire, L – 1528, Luxembourg. Please provide us with your email address and the merchant and/or transaction (if applicable) that your query is related to. As required under applicable law, please note that we may take steps to ask you to provide further information to verify your identity before granting you access to information or acting on your request to exercise your rights.

## **12. [CHANGES TO THIS NOTICE](#)**

We may change, amend or revise this Notice from time to time. We will notify you of any substantive or material change in this Notice by updating this web page, sending push notifications, e-mails or letters, by phone or by publishing announcements on our website.

You can view the latest version of this Notice on our website at any time.