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## Purchase Rewards - Questions and Answers about Data Sharing

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### Purchase Rewards – Questions and Answers about Data Sharing

1. Users with debit cards are "opted in" to the PR program by default. What information is being collected from the account?

**User account data:** a new non-PII account ID is created so that accounts can be identified with our 3<sup>rd</sup> party vendor and in certain situations with our merchants. This ID is relatable back to the account # in the Digital Insight data center. The account # is not shared with merchants or the 3<sup>rd</sup> party vendor. The account type is also used to determine which accounts are eligible.

**Transaction Data:** the transaction type, description, memo and amount fields are all used as part of the offer redemption and targeting processes. We do share transaction information that has been stripped of sensitive or PII data with our 3<sup>rd</sup> party vendor so they can improve their targeting algorithms and correct issues.

**User data:** the only piece of user data that is used is the ZIP Code which is utilized for geo-targeting. This is not shared with the vendor or merchants because the software that performs offer matching sits within the Digital Insight data center.

2. Where is the collected information going next? (If you could provide a detailed explanation of where the info flows, that would be ideal – as understood through flow charts, etc)

There is a diagram attached to help illustrate, but the collected information stays within Digital Insight's firewall. As was mentioned above, sometimes anonymized transaction data is shared with the 3<sup>rd</sup> party vendor to improve and correct targeting.

3. Is this information being stored anywhere and with who?

Information is stored in the Digital Insight data center.

4. Are customer lists being created? If so, who stores these?

No customer lists are created. We do provide reporting tools for our financial institutions so they have visibility into which accounts are activating and redeeming offers, but we do not provide customer data to our 3<sup>rd</sup> party or to merchants. For some merchants, we do provide the new anonymous account ID so that we can track offline redemptions, but this is neither sensitive nor personally identifiable information.

5. When a user decides to redeem an offer, within the PR program, does this change any answers to the previous questions?

No

6. Is additional information being collected?

No

# Purchase Rewards Data Flow Diagram

# Customer Data Remains Within the IFS Data Center

