



## **Privacy Policy**

*Draft*

### **Definitions**

EEA refers to the European Union Member States, Iceland, Liechtenstein, and Norway.

GDPR stands for The European Data Protection Regulation, effective as of May 25th, 2018, across all European Union Member States to standardize Data Privacy laws within the European Union.

### **Introduction**

This Privacy Policy outlines the categories of Personal Information we collect, the purposes for which we collect it, the parties with whom we may share it, our data security measures, and our data retention policies. It also explains your rights and choices regarding your Personal Information and how to contact us regarding our privacy practices.

Our Privacy Practices may vary across the countries where we operate to align with local practices and legal requirements. Specific privacy notices may apply to certain products and services. For more details on our privacy and information practices related to a particular product or service, please visit the corresponding webpage.

### **User Terms**

We acknowledge that transparency regarding data usage is fundamental to Data Privacy. Therefore, we encourage you to carefully review this Privacy Policy.

This Privacy Policy constitutes a part of our User Terms and is integrated therein.

By utilizing our Services, you agree to the terms outlined in this Privacy Policy, which may be amended by us periodically.

### **Personal Information We May Collect**

Information provided by you:

We collect and store any personal information (including financial details) you provide to us when you inquire about or apply for our Services, register to use our Services, upload/store information using our Services, or communicate with us through various channels such as email, SMS, website, portal, telephone, or other electronic means. This information may pertain to you or your customers and may include:

Full name (including first name and last name)

Date of birth and age



Email address, billing address, home address

Username

Password and/or photograph

Occupation

Nationality and country of residence

Copies of identification documents such as driver's license, passport, or other government-issued IDs

Card details including number, expiry date, CVC/CVV details, account numbers, balances, bank/issuer details

Information regarding your usage of our Services, such as transaction frequency, volume, account balances, transaction recipients, and senders

Biometric data, utilized for identity verification through third-party facial recognition software

Any other information provided in the context of utilizing our Services

### **How We May Use Your Personal Information**

We may utilize and share the personal information collected for the following purposes:

Providing our Services to you, including fulfilling our obligations, notifying you of important changes or developments, and recording transaction details.

Improving and developing our business, including optimizing our websites/portals, products, and services.

Managing and enforcing our rights, terms of use, or any other contracts with you, including managing disputes and complaints.

Preventing and/or detecting fraud, financial crime, managing risk, and protecting ourselves, our customers, and the financial system.

Contacting you about your account, alerting you to potential issues, and responding to your inquiries.

Sending marketing messages, providing information on products/services, obtaining feedback, and conducting market research.

Compliance with local laws and regulations, responding to law enforcement/regulatory requests, and fulfilling our terms of business.

### **Legal Basis for Processing**

We process your personal information in compliance with applicable laws, based on:

Your consent, where required by law

Necessity for the performance of contracts with you

Legitimate interests, provided they do not override your rights



Legal obligations or protection of vital interests

Public interest, when necessary

For details on the legal basis for specific processing activities, please contact us.

### **How We Share Your Information**

We do not disclose personally identifiable information to third parties except as described in this notice, permitted by law, or for the purposes outlined herein, including:

Sharing within our organization and affiliated companies

Sharing with payment recipients/senders, fraud prevention agencies, third-party service providers, and trusted financial service providers

Compliance with legal obligations and law enforcement/regulatory requests

With your consent, for specific purposes

We do not sell, rent, or share personal information for third-party marketing purposes unless legally permitted.

### **How Long We Retain Your Personal Information**

We retain your personal information as necessary based on the context, purpose, and applicable laws/regulations. This includes retaining information for the provision of services, compliance purposes, audit, and dispute resolution. We may anonymize or aggregate data when no longer needed for identifiable purposes.

For detailed information on data retention periods, please contact us.

### **Your Rights and Choices**

Depending on your jurisdiction, you may have rights including:

Right to be informed

Right to access, erase, rectify, restrict processing, or portability

Right to object to processing or opt-out of marketing

Rights related to automated decision-making, including profiling

These rights may be subject to limitations or restrictions. For example, we may not fulfill requests if legally obligated to continue processing or if necessary for contractual or legal reasons.

You can withdraw consent for processing your personal information, which will not affect prior lawful processing.



### **How We Protect Your Personal Information**

We have implemented technical, physical, and organizational measures to secure your information and depend on you to safeguard access credentials. While we strive for security, we cannot guarantee absolute protection.

### **Automated Decision Making**

We use automated decision-making processes in certain instances, with safeguards in place to protect your rights. You have the right to contest automated decisions.

For details or to exercise your rights, please contact us.

### **Children's Privacy**

Our Services are not intended for users under 18. If you are under 18, do not use our Services or provide any Personal Information. We reserve the right to verify and discard information collected from minors.

### **How to Complain**

If you have concerns about our use of your personal information, contact us. You also have the right to lodge a complaint with relevant supervisory authorities.

### **Updates or Amendments to this Policy**

We may update this Privacy Policy periodically, and the latest version will be posted on our website. Your continued use of our Services constitutes acceptance of any amendments.