

# Privacy Policy

## Respecting your privacy and protecting your personal data

**Last updated:** May 25, 2018

**Zantepay OÜ**, a limited liability company established under law of the Republic of Estonia, with registration code 14374253 ("**Zantepay**") collects, uses, stores and processes personal information in accordance with this Privacy Policy.

We know that privacy is important to you and we strive to be as open and transparent as possible. We conduct our business in compliance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and any other applicable Personal Data Protection regulations and have implemented additional measures to protect your personal information.

This Policy aims to help you understand how we collect, use, share and protect your personal information.

### Ways we collect your personal information

Unless given consent to do otherwise and/or otherwise permissible by and/or required by law, Zantepay will only collect and use personal information as set out below.

Throughout this Privacy Policy, we refer to your "personal information" as the data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller.

Zantepay collects your personal information when you:

- visit the Zantepay website or any other applications of Zantepay;
- register on our website;
- fill in any forms on the website;
- contact us with a question or request for help;
- accept referral invitation;
- place orders for Zantepay tokens, services and products;
- download, use and update Zantepay mobile applications;
- provide information for passing of anti-money laundering procedures.

### The information we collect

We collect information you provide directly to Zantepay or a Zantepay service partner (for instance, verification companies). The information that you provide us with depends on the products and services you use and register for.

Here are key examples:

- Your identity – This includes: your ID number and copy of ID document or other document, name, address, telephone number, email address, date of birth, nationality, gender, utility bills, photos, device ID, IP address and other information.

- Payment information – This includes: card information, bank information, transaction history.
- Your interaction with us – For example, a note or recording of a call you make to us, an email or letter you send to us or other records of any contact you have with us.
- Your account information – For example, the subscription services you use or other details related to your account.
- Information on your use of our services – For example, you make withdraw from you Zantepay account, as well as the amount, date and time of the transactions made.
- Information from other organisations – These organisations can include business partners with whom we are working with on Zantepay promotions, business directories, credit reference agencies, your Twitter or Facebook feeds or individuals we believe you have authorised to provide your personal details on your behalf.
- Information relating to use of the Zantepay application – These information facilitates our provision to you of the services through the Zantepay applications where necessary. For example Zantepay transactions, Wi-Fi connection and network communication (including NFC) information to allow use of Zantepay services.
- Information about your online browsing behaviour on Zantepay’s websites, mobile apps, and other Zantepay content online – please see our Cookies Policy for more details.

If you give us personal information about someone else (for example via a referral program), then you should not do so without his/her permission. Where information is provided by you about someone else, or someone else discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this Privacy Policy.

We may also automatically collect certain information about user’s computer device, browsing activities, statistical information, information on visits and use of Zantepay website and services. We may receive certain data automatically collected by our software, for example: IP address, cookies data, performance specifications of the user’s hardware and software, date and time of access to the Website, the URL of the page requested. This information is aggregated to provide statistical data about our users' browsing actions and patterns, and does not personally identify individuals.

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract and “legitimate interests”. Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer at [support@zantepay.com](mailto:support@zantepay.com). Please name your email as “DPO”.

### **Sensitive information**

We do not collect or request your sensitive information (including, but not limited to, information about your religious or political beliefs, opinions). We do not knowingly collect or request your Social Security number or other related information which is subject to any special security treatment. Where you have provided it to us voluntarily, you shall be solely responsible for security of any sensitive information, and we do not intend to use this information for any purpose, nor share this information with any third parties. Please do not

share your sensitive and other personal information that you would not want to be publicly available.

### **Grounds of processing data**

We process your data only where we have legal grounds to do so. In the context of the use cases described below, we are processing your data only where processing is necessary for the performance of a contract to which you are a party – i.e. a service or sale contract between you and us. We also process your data where it is necessary for compliance with our legal obligation in regard to provision of our services and products, as stipulated by accounting, taxation and other laws and to prevent criminal activity, fraud and money laundering. We may process your data where it is necessary for the purposes of our legitimate interests to prevent fraud, money laundering or unauthorized use of your account.

### **How we use your information**

Zantepay shall use the personal information you have given for better performance of Zantepay services. We may use the information to administer, evaluate and improve Zantepay business and for provisioning and administrating of services. Furthermore, Zantepay may use your personal information for market research, network and service enhancement, also for security and risk management. Zantepay uses your personal information in order to inform you about service upgrades, updates, advice, recommendations and/or service and security issues subject to your consent.

We may use your information for:

- provisioning & administration of services;
- process your orders and activate or deactivate services;
- identify you as a client;
- enable us to process payments;
- respond to enquiries and requests from you or people you have authorized
- inform you about service upgrades, updates, advice and/or recommendations;
- provision to you of services through the Zantepay application.

Market research, network & service enhancement:

- conduct market research and customer satisfaction surveys to improve our customer service; develop new products, as well as personalise the services we offer you;
- perform market analysis.

Sharing of rewards and benefits:

- offer rewards and promotions, and share promotional benefits and loyalty programs which you may qualify for;
- determining your eligibility for rewards and promotions;
- provide updates, offers, invitations to events and deliver relevant advertising.

Security and risk management:

- inform you of service and security issues;
- prevent and detect fraud or other crimes and recover debts;
- conduct internal audits;
- ensure the safety and security of our properties and systems;
- conduct checks against money laundering, terrorism financing and related risks;

- meet legal, regulatory and other requirements including providing assistance to law enforcement, judicial and other government agencies;
- conduct anti-money laundering, prevention of terrorism financing and related checks.

The information may be used to carry out any other purpose for which the information was collected within the legitimate basis.

### **Sharing your information**

We may share your information with:

- business partners and vendors we work with to deliver services you have registered for (for instance companies that help us with technology services, storing and combining data, and processing payments)
- industry regulators and other government organisations, as required by local laws and regulations;
- financial institutions for purposes related to your accounts linked to the Zantepay products and services;
- KYC providers;
- debt collection and tracing agencies and other companies in the same group.

Your information is disclosed to above only for relevant purposes (please refer to those mentioned in this Policy). In some cases, we encrypt, anonymise and aggregate the information before sharing it.

We will not disclose, sell, trade, or otherwise transfer your personal information to any third parties without your consent or unless otherwise stated in this Policy, except if you agree Zantepay may do so or if it is required to be disclosed by law, by a governmental agency or to protect the interests of Zantepay.

### **Data transfer**

The collected information may be transferred to a destination outside the European Economic Area ("EEA"). For instance, the computer servers used to host a website could be located outside the EEA – this is not unusual given that the internet is a global environment. To ensure your personal information remains safe when transferred like this, we will take all reasonable steps to maintain a suitable level of protection in line with this Policy.

Any transfer of your personal information to a location outside the EEA will be based on:

- the contractual Model Clauses adopted by the European Commission or a relevant data protection authority; or
- an adequacy decision from the European Commission, confirming that the third country provides adequate protection for your personal information; or
- Privacy Shield when transferring to the US (this is a form of certification which ensures that your data is handled in a way that is compatible with the strong EU protections); or
- Your consent, or another legal basis on which we are entitled to make the transfer.

Despite data transfer, we save all our obligations and liability for any breaching of your personal data rights by action of our data-processors.

### **Protecting your information**

We have implemented stringent measures to secure and protect your information. These include:

- safeguards to prevent security breaches in our network and database systems;
- strict verification processes to prevent unauthorised access to information;
- our website is scanned on a regular basis for security holes and known vulnerabilities.

However, no method of transmission over the internet, or method of electronic storage, is completely secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

### **Your rights related to your personal data:**

You have the right to request:

- (i) access to your personal data;
- (ii) correction of your personal data if it is incomplete or inaccurate; or
- (iii) deletion of your personal data;
- (iv) object to, or limit or restrict, use of your personal information;
- (v) receipt, under certain limited preconditions, your personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller.

You also have the right to object to the processing of your personal data on compelling legitimate grounds relating to your particular situation (for instance, if the data is not correct).

Where we have obtained your consent for the processing of your personal data, you have the right to withdraw your consent at any time. You also have the right to object to the processing of your personal data, including opting-out from the use for direct marketing purposes.

If you have a concern about the way we handle your personal information, you have a right to lodge a complaint.

You can exercise any of the above rights at any time by contacting at [support@zantepay.com](mailto:support@zantepay.com).

### **Respecting your contact preferences**

We may send marketing messages to you if:

- you have given us explicit consent,
- the sending of such messages is permissible under applicable laws and regulations.

Our marketing messages aim to update you about our exclusive offers, rewards programs and special deals.

If you wish to continue receiving such messages, opt out, or withdraw your consent to our collection, use and disclosure of your personal information, you can indicate your preference at any time via [support@zantepay.com](mailto:support@zantepay.com).

Your request will be processed as soon as practical. Please note that after opting out, you may still continue to receive non-marketing messages, such as product updates and service notices as permitted under applicable local laws and regulations.

### **Retention of your data**

We retain your personal data for as long as your account is in existence or necessary to fulfil the purposes for which we collect it or as needed to provide you with the services, except if required otherwise by law. However, when you cease using Zantepay services, we will normally still retain your personal information for a period of time. Usually, we will store your personal information for a period of 5 (five) years after you cease being a customer of Zantepay, beginning at the date your account is closed. There are several reasons which we retain your information even longer, these include:

- To comply with legal obligations under EU/local laws (for example, anti-money laundering and accounting regulations, or licensing regulations);
- To establish or defend legal claims which could be made against us.

Please note that retention periods may be changed from time to time based on business or legal and regulatory requirements.

### **Merge of company**

If Zantepay merges with, or is acquired by another company or organization, or sells all or a portion of its assets, your personal information may be disclosed to our advisers and any perspective purchaser or any prospective purchaser's adviser, and may be among the assets transferred. However, personal information will always remain subject to this Policy.

### **Data Protection Officer**

To communicate with our Data Protection Officer, please contact us at [support@zantepay.com](mailto:support@zantepay.com). Please name your email as "DPO".

### **General Information**

By using Zantepay.com website or its applications, you signify your acceptance of this Policy. If you do not agree to this Policy, please do not use Zantepay.com website or any of its services. Your continued use of the website following the posting of changes to this Policy will be deemed as your acceptance of those changes.

We may amend or modify this Policy from time to time. We remain committed to safeguarding your information and being open about our data protection practices.

This Policy applies to all Zantepay products and services provided by Zantepay OÜ.