

PRIVACY POLICY

Last update: 4th of January, 2021

This Privacy Policy governs collection, processing and use of your personal data by Point Pay OÜ, a company incorporated under the laws of Estonia with registration number 14408006, and located at: Harju maakond, Tallinn, Kesklinna linnaosa, Tuukri tn 19, 10120 (hereinafter – the “**Company**” or “**We**”) By using PointPay ecosystem and/or any services inside PointPay ecosystem you hereby agree with this Privacy Policy without limitations.

This Privacy Policy is designed to address regulatory requirements of the jurisdictions in which the Company offers its services, including General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), Estonian Personal Data Protection Act (PDPA) and the Estonian Personal Data Protection Implementation Act (Implementation Act) enacted by the European Commission.

The Company undertakes maximum efforts in order to protect your privacy. The Company uses the collected information about you to fulfill its contractual obligations and improve the customer service.

All the terms that have definitions in PointPay Terms and Conditions shall have the same meaning in this Privacy Policy. “Personal data” shall mean any information relating to an identified or identifiable living individual.

PLEASE READ THE PRIVACY POLICY CAREFULLY BEFORE CREATING YOUR ACCOUNT. IF YOU DO NOT AGREE WITH ALL OR ANY THESE TERMS, PLEASE LEAVE THE WEBSITE IMMEDIATELY, DELETE THE MOBILE APPLICATION AND DO NOT USE POINTPAY ECOSYSTEM.

I. COLLECTION OF YOUR PERSONAL DATA

1.1 We may collect and process the following data about you:

1.1.1 Information you provide to us in your account that is essential to perform the Services and/ or to check your identity in accordance with legislation and/or the Company’s AML&KYC internal policy (your full name, copy of your governmental ID or passport, utility bill with address proof, bank statement, selfie photo, email, telephone number, etc.);

1.1.2 Information that you write in your profile or in our forum on voluntary basis (your income, your education, your experience and place of work, etc.);

1.1.3 Technical information, including but not limited to your internet protocol (IP) address used to connect your device to the internet, your browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

1.1.4 Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time);

products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;

1.1.5 Information about geolocation (i.e., real-time location) will be collected based on information from your device at any time while you download or use our services to optimize your experience;

1.1.6 Financial data and information on the use of services and facilities in PointPay ecosystem, including information on implemented transactions and parties thereto, including on transactions, information on the status and (crypto) currency of accounts and cash flow on them, accrued commissions, information on crediting and withdrawal of funds from our accounts.

1.2 We do not collect information that you provide to our payment processing partners. They may collect your information directly. Please, visit their websites and read their privacy policies before you proceed with payment.

1.3 We may collect your data that we receive from other sources, including but not limited to business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, etc.

II. USE OF YOUR PERSONAL DATA

2.1 We use your data for the following purposes:

2.1.1 To fulfill the obligations and to provide you with the services for which we have received your consent;

2.1.2 To understand your needs and preferences in using our services, to evaluate and understand the effectiveness of advertising materials that we provide;

2.1.3 To develop new and enhance existing service and product offerings, to notify you about changes related to our services;

2.1.4 To verify and check the identity of users who open and operate accounts in order to prevent fraud, deception, and other illegal activities;

2.1.5 To comply with legal requirements for anti-money laundering and counter-terrorist financing;

2.1.6 To ensure the security of our website, our services, and your account;

2.1.7 To support, respond and resolve your complaints and issues related to use of our services and the capabilities of our website and mobile application.

2.2 We use aggregated personal data to understand how our users use our services, provided that those data cannot identify any individual. We also use third-party web analytics tools that help us understand how users engage with our website.

III. DISCLOSURE OF YOUR PERSONAL DATA

3.1 We may share your information with selected third parties including:

- 3.1.1 business partners, suppliers and independent contractors for the performance of any contract we enter into with them or you;
- 3.1.2 advertisers and advertising networks (only aggregated personal data);
- 3.1.3 analytics and search engine providers that assist us in the improvement and optimization of PointPay ecosystem;
- 3.1.4 user that invited you to PointPay ecosystem through referral program (only your financial data, trading statistics).

3.2 We may also disclose your personal data if:

- 3.2.1 in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- 3.2.2 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or other terms; or to protect the rights, property, or safety of PointPay ecosystem, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

IV. SECURITY AND STORAGE OF YOUR PERSONAL DATA

4.1 We have implemented security measures to ensure the confidentiality of your personal data and to protect your data from loss, misuse, alteration or destruction. Only authorized representatives have access to your personal data, and these representatives are required to treat the information as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

4.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

4.3 We will not sell, rent or lease your information to third parties. However, we may share your information with trusted third parties to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to us, and they are required to maintain the confidentiality of your information. We will not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

4.4 Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

V. USE OF COOKIES

5.1 Cookies are typically stored on your computer's hard drive, which assigns a unique identification to your computer. We also may use cookies stored in emails to help us confirm your receipt of, and response. We also may use service provider(s) who will place cookies on the hard drive of your computer and will receive information that we select that will give us information about the way our users and visitors navigate on our site, what products are browsed, and general transaction information.

5.2 Information collected from cookies is used by us to evaluate the effectiveness of our services, to analyze trends and to see what difficulties our visitors may experience. We need this information to improve the quality of our service.

VI. MISCELLANEOUS

6.1 The Privacy Policy shall remain in full force and effect while you use PointPay ecosystem.

6.2 The Company reserves the right to modify the Privacy Policy at any time at the Company's sole discretion. The will notify you about amendments by automatic notification on the Website and inside the Application, but will not ask any actions to confirm that you agree. If you do not agree with the new amended version, then you must immediately discontinue your access to PointPay ecosystem and stop use all the Services. If you continue to use the Services, the amended Privacy Policy have legal force for you and your actions will constitute acceptance of the amendments.

6.3 If you have any questions regarding this Privacy Policy, please, contact us by e-mail: info@pointpay.io