

Privacy Policy

Introduction

Privacy Policy is the main document that sets out the basis as to what happens to any personal data that the Customer provides for the Company, or that the Company collects from the Customer or other sources while using the Company's Service about the Customer. The Customer may choose not to provide any information to the Company, however Epayblock may be unable to provide Service.

Data controller of the Customer's personal data is UAB "Epayblock", company code 304882406 (hereinafter – the **Company**), registered address at Upės 23, 08128 Vilnius, Lithuania. The Company is the electronic money institution authorized and regulated by the Lithuanian supervisory authority – Bank of Lithuania. The Company's activities include the issuing of electronic money, the redemption of electronic money, issuing and/or acquiring of payment instruments, execution of payments transactions and services enabling cash to be placed on a payment account as well as all the operations required for operating a payment account. The license of the Company and all activities covered by it can be checked: <https://www.lb.lt/en/sfi-financial-market-participants/uab-epayblock>.

All activities of the Company are regulated by the applicable laws related to the electronic money, including, but not limited to the legal acts related to the financial institutions and financial services. Moreover, as the Company is collecting and using the personal data of its customers (hereinafter – the **Customers**), the Company is obligated to use and process the Personal data of the Customers in accordance with this privacy policy (hereinafter – **Privacy policy**) and acts which regulate the protection of Personal data.

Security is highly important to us. We take all reasonable measures to protect personal data from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction, including industry standard security and encryption features.

If the Account is opened by legal person, head or other representative of the Customer shall properly inform data subjects (among others, beneficial owners etc.) about transfer of their data to us and to present this Privacy policy to them.

Please pay attention to the fact that Epayblock may update this Privacy policy from time to time, therefore please do review it regularly.

Principles of processing personal data

The Company commits to comply with the provisions of:

- 1) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation),
- 2) the Law on Legal Protection of Personal Data of the Republic of Lithuania and
- 3) all of the other Laws and/or legal acts that are applicable, as well as all of the European Union acts that are applicable in accordance with the Personal data protection regulations that are applicable.

This Privacy policy is prepared for the introduction of the Customers how the Company is processing the personal data of the Customers as well as what kind of measures are implemented in the Company to achieve the adequate protection of the personal data of the Customers that are being processed during the provision of Services. The principles that the Company strictly follows to comply with the needs to protect its Customers' personal data.

1. Personal data is collected for specified and legitimate purposes and is not further processed for purposes incompatible with those purposes established prior to the collection of personal data.
2. Personal data is processed accurately, honestly and lawfully.
3. Personal data is identical, suitable and only to the extent which is necessary to collect and further process the personal data.
4. The personal data is stored for the period specified by the Company, but not longer than the terms set forth by the applicable legal acts allow as well as when the storage term is expired the personal data are destroyed.

5. Implementation of adequate organizational measures, designed for securing personal data against accidental or illegal destruction, modification, disclosure, and any other illegal management.

6. Implementation of measures designated for the prevention of use by persons seeking to acquire funds by fraudulent means.

7. The personal data of the Customers is considered as confidential information and may only be disclosed to the third parties in accordance with the rules and procedure provided in the Privacy Policy, internal documents of the Company and the legal acts of the Republic of Lithuania.

Legal basis for Personal data processing and purposes

Personal data is processed in the Company when the Customer has given consent and / or when processing of data is necessary in order to fulfill the agreement to which the Customer is a party, or to take action at the request of the Customer prior to the conclusion of the agreement and / or to process the personal data is necessary for the fulfillment of the legal obligation imposed on the Company.

The purposes of the processing of the personal data, among others, are following:

(a) Provision of services of issuance, distribution and redemption of electronic money and provision of payment services;

(b) Conclusion and execution of the agreements;

(c) Customers' identifications;

(d) Implementation of the obligations under the Law on Money Laundering and Terrorist Financing Prevention;

(e) As well, the Company may collect and process Personal data of the Customer for direct marketing.

The Personal data collected for direct marketing purposes may be processed with the consent of the Customers which clearly indicates that the Customers agree with the processing of their personal data for the direct marketing purpose. The direct marketing of similar services to existing Customers may be done without their prior consent only, if they are provided with clear and easy opt out possibility. Direct marketing is the

activity that is intended to offer the goods or services to the Customer by post, telephone or other direct way as well as to inquire the opinion of the Customers about the offered goods and services. In case if the Customers do not agree with the processing of their personal data for direct marketing purpose, the personal data for the direct marketing is not processed.

The Customers are granted the right to withdraw their consent given for the processing of the personal data for the purpose of direct marketing. The Customer may withdraw the given consent anytime by sending the information to e-mail: legal@epayblock.it as well as by using the electronic channel which is dedicated for the management of the Customer account and for the communication with the Company.

Processed personal data and their storage term

According to the purposes specified above, the following personal data are processed by the Company:

a) Name, surname, personal code, date of birth, age (year of birth), address, residence place, identification card (passport) number, issuance place and date, mobile phone number, email address, employment data;

b) Customers (natural persons) – personal code or other unique character sequence assigned to this person for identification, photo, signature, financial institution account number, IBAN number, debit card number, video and audio record for identification, telephone conversations, client IP addresses, date of client transactions, amount of transactions, currency, location, data about the beneficiary of the funds, the history of the actions performed, the source of funds, gender, nationality, employment status;

c) Representatives of the clients (legal entities) (members of the client's management bodies and other representatives (for example, employees) who are authorized according to the corporate documents to represent the client in relations with the data controller or acting in accordance with the power of attorney, pro-curation when representing the client): personal code or other unique character sequence assigned to this person for identification, personal identity document data, e-mail address, gender, position, surname, address, nationality, phone number, name, photo, signature, bank account information (bank name and bank account number), monetary transaction or transaction date, amount, currency, data about the beneficiary of the

funds (natural person's name, surname, date of birth, personal identification number or other unique character assigned to this person to identify the person, legal entity name, legal form, registered office address, code, if any);

d) Ultimate beneficiary owners of the clients (legal entities) (natural persons who directly or indirectly own a legal entity with a sufficient number of shares or voting rights or otherwise exercise control) and managers: personal identification code or other unique character sequence assigned to this person, identity card, surname, address, nationality, name, photo, signature, number of shares held, voting rights or share capital part, monetary transaction or transaction date, amount, currency in which the monetary transaction or transaction is executed, data about the beneficiary of funds (natural person's name, surname, date of birth, personal identification number, or other unique character assigned to this person to identify the person, legal entity name, legal form, registered office address, code, if any).

The Company may also process some other personal data, if such data are necessary to provide the contracted Services or comply with applicable law.

The personal data collected and processed for the purposes of the direct marketing is as follows, among others: name, surname, the email address, mobile phone number, the address of the place of residence.

The personal data of the Customers are kept in such a way that the identity of the Customers can be determined for no longer than is necessary for the purposes for which personal data are processed. The terms of storage of the personal data of the Customers in case of the purposes indicated in this Privacy policy, excluding the purpose for the direct marketing, are set forth by the applicable law. Personal data are may be retained after expiry of the agreement concluded between the Customer and the Company. The Company strictly follows those terms and in case changes appear, the terms are changed in accordance with the changes. The personal data of the Customers collected and processed for the purpose of direct marketing shall be kept no longer than the consent of the Customers' is valid.

The personal data of the Customers may be obtained from the Customers itself as well as from other sources such as: commercial banks, other credit and financial institutions, relevant public registers, service providers, third parties or other publicly

available sources. Personal data from commercial banks, other credit and financial institutions is obtained through execution of the payment transactions.

Customers' Personal data recipients

Customers' personal data specified in this Privacy Policy may be transferred, if applicable, to:

- a) payment service users (payees and payers);
- b) financial institutions (subject to Customer's consent and in the scope of the personal data of the solely specified by Customer);
- c) agent of other payment institution or regulated entity;
- d) Company's suppliers of software development and support services (who are regarded as Company's data processors processing personal data on behalf of the Company and in accordance with the Company's instructions); or
- e) other suppliers.

Processing the Customer's information, as described above, may involve sending it to other countries outside of the EEA (European Economic Area). In such circumstances the Company is responsible for making sure that the Customer's information continues to be protected. Any transfer of personal data to data recipients in third countries outside the EEA or to international organizations will be done strictly in accordance with the applicable legal requirements and will be based either on standard contractual clauses approved by the European Commission or other competent bodies or on other tools/arrangements/permits which authorize such transfer.

Use of Cookies

Cookies are files, often including unique identifiers, that are sent by web servers to web browsers, and which may then be sent back to the server each time the browser requests a page from the server.

The Company has its own website and during website visit, in order to provide the website visitor with the full range of services provided by the Company, and in order to improve the quality of its services provided to the website visitor's computer (device), cookies may be obtained. The Company uses the information contained in the records

to identify the website visitor as a previous visitor of the Company's website, and to obtain information on the source, time of the visit to the website.

The data received by using cookies is not used and on the basis of this data it is impossible to identify a particular natural person. The Company does not use the information received by cookies to contact the website visitor using mail, email or by phone.

The Customers have to express their consent or non-consent of using the cookies by selecting one of the options that appear before starting to use the website of Company: "OK" or "Deny". Any website visitor has the right to withdraw their given consent at anytime.

Google Analytics Cookies

Google Analytics uses cookies which record anonymous information such as how many pages you visited on this website, the traffic source that brought you on our website, how much time you spent on the page. The information collected is used to measure, monitor and improve our website performance. No sensitive personal information is collected through Google Analytics.

Security of personal data

The Company implements appropriate organizational and technical measures to protect the Customers' personal data from accidental or unlawful destruction, modification, disclosure, as well as any other unlawful handling. However, no method of transmission over the Internet is 100% secure. In the unlikely scenario that Customers' personal data is compromised due to the data breach or if the Company comes to learn that either it's system or Customers' account specifically has suffered the security breach; the Company will take all reasonable steps to remedy the breach as well as notifies the Customers as soon as possible.

Third Party Links

The company does not take any responsibility regarding any third-parties links or advertisements found in in the Company's website and their privacy policies used.

The rights granted to the Customers as personal data subject

In accordance with statutory regulations on data protection, the Customers have the right to access the personal data relating to the Customers and which has been collected or disclosed by the Company and the right to have such personal data rectified in case such personal data is inaccurate or incomplete. The Customers are granted the following rights:

a) Right of access. The Customer has the right to obtain from the Company confirmation as to whether or not personal data concerning him/her is being processed, and, where that is the case, to access the personal data.

b) Right of rectification. The Customer has the right to obtain from the Company the rectification of inaccurate personal data concerning him/her, also the right to have incomplete personal data completed. Please be advised that the Company may need to verify the accuracy of the new data the Customer provides to the Company.

c) Right to restriction of processing. The Customer has the right to obtain from the Company restriction of processing if there is a legitimate reason. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the Customers consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the EEA.

d) Right to data portability. Customer has the right to receive the personal data concerning him/her, which Customer provided to the Company and has the right to transmit data to another data controller. Please be advised that this right only applies to information which the Customer provided to the Company.

e) Right of erasure (right to be forgotten). The Customer has the right to obtain from the Company the erasure of personal data concerning if there is no legal ground for the Company continuing to process it. The Company may not always be able to comply with the request of erasure for specific legal reasons which will be notified to the Customer, if applicable, at the time of the request.

f) Right to object. Customer has the right to object at any time to the processing of personal data concerning him/her which may be processed for the purposes of Company's legitimate interests.

g) Right to withdraw the consent at any time where the Company are relying on the consent to process Customer's personal data. However, this will not affect the lawfulness of any processing carried out before the Customer withdraw his/her consent. In some cases if the Customer withdraws his/her consent, the Company may not be able to provide the Services to the Customer.

The Company undertakes that all other rights of data subjects as described in applicable laws are guaranteed for the Customers. If the Customer believes that the manner of processing of personal data at the Company is inconsistent with applicable law, the Customer has the right to contact the Lithuanian State Data Protection Inspectorate.

Procedure of handling requests and complaints

The Company ensures that the requested information will be provided in one (1) month after the day the request was received by the Company. The Customer can also file the complaint regarding the processing of his/her personal data in the same manner.

The Customer has the right to submit application regarding the issues of personal data processing directly to the State Data Protection Inspectorate which is the supervisory authority of the Company for the protection of personal data. The Customer may apply in accordance with the procedures for handling complaints that are established by the State Data Protection Inspectorate.

Contact the Company

The Company will be happy to help if any issues occur. Please contact the Company by sending an e-mail to our DPO contact listed below.

Data Protection Officer: Rusne Juozapaitiene

Email: legal@epayblock.com