

# Paytion PRIVACY POLICY

Last updated: 1st of November 2019

**Paytion** understands that Your privacy is important to You and that You care about how Your information is used and shared online. We respect and value the privacy of everyone who visits Our Site or Uses Our Services and will only collect and use information in ways that are useful to You and in a manner consistent with Your rights and Our obligations under Data Protection Legislation.

## 1. INFORMATION ABOUT US

Our Site, [www.paytion.com](http://www.paytion.com), is owned and operated by Paytion OÜ, a limited company registered in Estonia under registry code 14630992, whose registered address is Harju maakond, Kuusalu vald, Pudisoo küla, Männimäe, 74626, Estonia.

## 2. WHAT DOES THIS POLICY COVER

2.1. This Privacy Policy applies only to Your use of Our Site or Our Services. It does not extend to any websites that are linked to from Our Site. We have no control over how Your data is collected, stored or used by other websites and We advise You to check the privacy provisions of any such websites before providing any data to them.

2.2. Paytion handles Personal Data both as a Controller – such as in respect of your Paytion account and as a Processor on behalf of third parties – such as our service providers who may get access to Your Personal Data in cases defines below.

2.3. This Policy applies to Our use of all data collected directly by us as a data Controller or processed by us on behalf of third parties, as data Processor, in relation to Your use of Our Site or Our Services via Your usage of technology such as, but not limited to, HTML widgets hosted on third-party platforms.

## 3. WHAT DATA DO WE COLLECT

### 3.1. Information you give to us

You can provide us with information about yourself by filling in the relevant forms on the website or by providing us such information by phone, email, during a video conference or in any other manner. This information includes Personal Data which was specified when registering on the Site, when subscribing to our Service, opening a User account and verifying the identity of the account holder or persons authorized to use it, as well as the payment instruments used by a person, when searching for a product, using any of services provided by our website, while placing orders on our website, by participating in discussions or using any other communication functions on our website, during participation in draws, promotions or surveys, and also when you tell us about problems or issues in the work of the website. The data that You provide us, can include your last name and first name, your photos; Your videos, your address; Your nationality, Your tax residency, Your phone number; Your e-mail address; Your logins and nicknames, Your bank details, including account numbers and payment details; your date of birth; Your education; Your experience and place of work, Your sources of income and their amount; information on the status of Your accounts opened with banks or payment systems.

### 3.2. Information we collect about You

With regard to each of Your visits to our Site and use of our services we can collect, for example, the following information about You (including automatically):

technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;  
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;  
information about geo-location. We may collect information about real-time location based on information from your device at any time while You download or use our services. We may use this information to optimize Your experience.

financial data and information on the use of services and facilities provided by our website, 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.

### **3.3. Information we receive from other sources**

We may receive information about You if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about You from them.

## **4. COOKIES**

4.1. You may restrict Your internet browser's use of Cookies.

4.2. Our Site may place and access certain first party Cookies on Your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve Your experience of Our Site and to provide and improve Our products and Services. We have carefully chosen these Cookies and have taken steps to ensure that Your privacy is protected and respected at all times.

4.3. By using Our Site, You may also receive certain third-party Cookies on Your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. We use third party Cookies on Our Site for analytics, advertising and general business purposes. These Cookies are not integral to the functioning of Our Site.

4.4. All Cookies used by and on Our Site, are used in accordance with current Estonian and EU Cookie Law.

4.5. Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. This, in turn, enables Us to improve Our Site and the products and Services offered through it. You do not have to allow Us to use these Cookies, as detailed below, however whilst Our use of them does not pose any risk to Your privacy or Your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for You.

4.6. You can choose to enable or disable Cookies in Your internet browser. Most internet browsers also enable You to choose whether You wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in Your internet browser or the documentation that came with Your device.

4.7. You can choose to delete Cookies at any time however You may lose any information that enables You to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

4.8. It is recommended that You keep Your internet browser and operating system up-to-date and that You consult the help and guidance provided by the developer of Your internet browser and

manufacturer of Your computer or device if You are unsure about adjusting Your privacy settings.

## **5. PURPOSE OF DATA COLLECTION AND PROCESSING**

5.1. We may use your Personal Information for the following purposes:

to allow You to open and operate a Paytion account on the Site;

to enable You to complete Transactions on the Site;

if you contact us, to reply to Your queries; to contact You via e-mail, chat, video-conference or calls;

to ensure security of Your Paytion account;

to analyse use of our Sites;

as required for regulatory purposes such as Tax, prevention of Money Laundering, prevention of Fraud, adherence to Company statistical reporting obligations etc.;

to provide You with information about products and promotions that may be of interest to you, from ourselves and third parties, although only if you have specifically agreed to receive such information;

for market research e.g. surveying our Users' needs and opinions on issues, such as our performance etc.

5.2. Unless consented, Your data for this purpose would be anonymised.

## **6. LEGAL BASE FOR PERSONAL DATA PROCESSING**

6.1. We collect and process your Personal Data only when we have a legitimate reason for such processing. Legal grounds include consent (in cases where you provide it), an agreement contract (in cases where processing is necessary to fulfill the terms and conditions of contracts between you and Paytion), compliance with a legal obligations (in cases where Paytion is required to request / receive and process as well as to store your Personal Data in order to comply with the requirements of applicable laws, for example the laws related to anti-money laundering and counter-terrorist financing and legitimate interest (for example, when processing is necessary to protect you or us from certain threats (fraud, security, etc.)), compliance with the provisions of applicable laws, the proper level of conduct of our business (the quality of the services provided, identification of needs, preparation of reports), conclusion and implementation of corporate transactions (sale of participant interests / shares, mergers, acquisitions), etc.).

6.2. In cases where the basis for data processing is the consent, you have the right to withdraw it at any time.

## **7. SECURITY AND STORAGE OF PERSONAL DATA**

7.1. We keep Your data for as long as We need to in order to use it as described in this Privacy Policy and for as long as We have Your permission to keep it and/or as required under Data Protection Legislation.

7.2. Your data will be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).

7.3. The information we receive from you can be transferred and stored outside the European Economic Area (EEA). The information about you can be processed by our employees or employees of service providers outside the EEA.

7.4. When storing or otherwise processing information by such third parties outside the EEA, we guarantee that we will notify such third parties of our obligations under this Privacy Policy and will enter with them into relations that will impose obligations for them regarding Your Personal Data, provided that they at least have level of protection as specified in this Privacy Policy. Such employees, among other things, can process Your requests, payment details and provide technical support. By giving us Your Personal Data,

7.5. You consent to the transfer, storage and processing of Your Personal Data. In its turn, we will take all necessary measures to ensure that Your Personal Data is processed in compliance with the security rules and in accordance with the provisions of this Privacy Policy.

7.6. We have implemented security measures to ensure the confidentiality of Your Personal Data and to protect your them from loss, misuse, alteration or destruction. Only authorized personnel of Paytion have access to Your Personal Data, and these personnel 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.

7.7. Data security is of great importance to Us, and to protect Your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site. Steps We take to secure and protect Your data include: encrypting communication between users and our servers by enforcing SSL; encrypt sensitive data such as communication between users at rest; apply proactive security best practices

7.8. Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that You are advised to take suitable precautions when transmitting to Us data via the internet. Although we will do our best to protect your Personal Data, we cannot guarantee the security of Your data transmitted to our site, and 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.

## **8. USER RIGHTS AND CONTROL**

8.1. Subject to the provision of this Clause, You have the legal right to: ask for a copy of any of Your Personal Data controlled by Us; correct any information that is controlled by Us; delete information controlled by Us.

8.2. Where We process Your data on behalf of a third party (who is the data Controller) You should make requests in the first instance to them. We will not charge a fee for complying with such requests. Requests should be made by email to support@paytion.com.

8.3. Where We are the Controller of the Personal Data that You have requested, We will respond to the request within 1 month, unless the request is particularly complex. As data Controller We may exercise the right to withhold details of Personal Data requested by You where disclosure would adversely affect the rights and freedoms of others.

8.4. When You submit Personal Data, to Us You will be given options to restrict Our use of Your data. In particular, We aim to give You strong controls on Our use of Your data for direct marketing purposes (including the ability to opt-out of receiving communications from Us or select third parties, which You may do by declining the option to receive such communications at the point of accessing the Services or by unsubscribing using the links provided in Our emails, by managing Your Account or through making a request under section below.

8.5. You may access certain areas of Our Site without providing any data beyond that required for the function that You wish to use, to operate. However, to use all features and functions available on Our Site or within Our Services and specifically where Your Personal Data is a prerequisite for the operation of that Service You may be required to submit or allow for the collection and processing of certain data. Where that is the case, We will advise You at the point that You seek access to such Services. Where, in such circumstances, you chose to withhold any Personal Data requested by us, it may not be possible to access parts of Our Site or to use the Services that you are requesting access to.

## **9. CONTACT US**

If You have any questions about Our Site or this Privacy Policy, please contact Us by email at support@paytion.com, or by post at Harju maakond, Kuusalu vald, Pudisoo küla, Männimäe, 74626, Estonia. Please ensure that Your query is clear, particularly if it is a request for information about the data We hold about You.

**10. CHANGES TO POLICY**

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and You will be notified that a change has been made.