

EU PRIVACY POLICY

THIS PRIVACY POLICY IS INTENDED FOR CUSTOMERS OF INTERPAY LIMITED. If You are not resident in the EU please click [here](#) for the applicable Privacy Policy.

Privacy Policy and Data Protection

Words not defined here shall have the meaning set out in the Transfermate Terms and Conditions ([here](#))

1. Definitions

“Cookies” mean small text files that are placed on Your computer or mobile device when You browse websites.

“We”, “Us” or “Our” mean Interpay Ltd.

2. Introduction

This Privacy Policy, issued in 12 August 2021, constitutes part of the legal relationship between You and Us. The other elements of the legal relationship being Our Terms and Conditions`, Our Anti-Money Laundering Policy and the terms governing any other additional services provided by Us to You.

3. Privacy Policy

- **3.1 Collection of Information**

- Protecting Your privacy is important. In order to provide You with Our services, We must collect certain personal information about You and obtain Your consent in relation to the handling of such personal information. You will provide to Us upon request all such information in relation to Your financial and business affairs and/or identity, as We may reasonably require which may also be used for analytical or any secondary purposes such as archiving, audits, statistical/historical purposes.
- In addition to the personal data required for the processing of Your interaction, We will also use this data to advise You of new changes or additions to Our services, or information related to foreign exchange rates. Additionally, We also collect non-personal data.
- “Non-Personal Data” – Like most websites, We gather statistical and other analytical information collected on an aggregate basis of all visitors to Our Website. This Non-Personal Data comprises information that cannot be used to identify or contact You, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of Our Website.

- **3.2 Use of Information**

- You hereby consent to our collection, use, disclosure, storage and processing of Your personal information in accordance with Our Privacy Policy, Our Terms and Conditions and Our Anti-Money Laundering Policy, and to use it in other ways as required by law, or where permitted under the terms of the applicable Data Protection legislation. This disclosure and processing may extend to the disclosure of Your personal information to our affiliates and

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other trusted businesses or persons to process it (or sub-process it) for Us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use banking partners to enable us to deliver the payment service to You.

- In all cases where there is personal data of a living individual provided by You, it is incumbent on You to ensure that You have due consent from that individual, to Our collection, use, disclosure and processing of that individual's personal data in accordance with Our Privacy Policy, Our Terms and Conditions and Our Anti-Money Laundering Policy, and We further affirm that We shall only use that personal data as required by law, or where permitted under the applicable Data Protection legislation. We shall never use that personal data for any marketing purpose or share that personal data with any third parties unless sharing the personal data with a third party is essential for the provision of the payment services or required by the regulator.
- Where You provide Us with information which is solely associated with a corporate entity and which is not personal data directly associated with a living individual (collectively "Corporate Data"), then notwithstanding that, We shall meet Our respective obligations for how We obtain and process this Corporate Data, and You understand that this Corporate Data shall be used by Us for the following purposes:
 - to deliver the payment service to You; and
 - to promote and market Our services and those of our third party partners to the corporate entities referred to in the Corporate Data.
- **3.3 Identity Verification**
 - You will be required to provide evidence to verify identity. If We are not satisfied with the information provided by You, We may request additional information. We will not accept an application and the full range of Transaction Service will not be available to You unless and until verification procedures have been completed to Our satisfaction.
- **3.4 Consent to Search Public Databases**
 - You consent to an electronic database search and credit reference agencies search by Us in order to verify Your identity and credit standing. We shall retain records of the contents and results of such searches in accordance with all current and applicable laws. We further reserve the right, if considered appropriate at Our sole discretion, to provide relevant information regarding You and Your transactions to credit reference and law enforcement agencies.
- **3.5 Information correct**
 - You must ensure that all information provided to Us is accurate and up-to-date at all times. Any changes must be advised to Us as soon as practicable. You may ask Us for a copy of Your personal

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information so You may review it and correct or change it if necessary. We will respond to Your request as soon practicable.

- **3.6 Protection of Information**

- We collect and store all information electronically, and take reasonable steps to protect such information from unauthorised access, misuse, loss or destruction. We shall in no way be liable to You for any loss or damage You may incur as a result of the loss or theft of such information held by Us.

- **3.7 Retention of Information**

- Any information collected by Us, including telephone recordings or transcripts, may be kept or destroyed in accordance with relevant Data Protection Legislation or regulatory legislation as may be amended from time to time.

- **3.8 Recording phone conversations**

- Both You and Us consent to the electronic recording by either party of telephone conversations between them without an automatic warning tone, and the utilisation of such recordings as evidence by either party in any dispute or anticipated dispute between the parties or in relation to any dealings between the parties.

- **3.9 Cookies**

- [Our Cookie Policy](#) provides details on the Cookies Our Website uses. Our cookies do not store any personal identifiable information. You can switch Cookies off by adjusting Your internet browser settings to stop it accepting Cookies. Please be aware though that turning off Cookies will impair the performance of many websites and not just Ours.

- **3.10 Unsubscribe**

- If You decide that You no longer wish Us to keep or use information or You want the information to be revised or updated, please feel free to [contact Us](#). We will remove or amend the information as appropriate in accordance with applicable legislative and regulatory requirements.

- **3.11 What are Your data protection rights?**

We would like to make sure You are fully aware of all of Your data protection rights:

- The right to access – You have the right to request from Us copies of Your personal data.
- The right to rectification – You have the right to request that We correct any information You believe is inaccurate. You also have the right to request that We complete the information you believe is incomplete.

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- The right to erasure – You have the right to request that We erase Your personal data, under certain conditions. Exemption to this right includes compliance with a legal obligation to which We are subject e.g. retention is required to meet AML obligations.
- The right to restrict processing – You have the right to request that We restrict the processing of Your personal data, under certain conditions.
- The right to object to processing – You have the right to object to Our processing of Your personal data, under certain conditions.
- The right to data portability – You have the right to request that We transfer the data that we have collected to another organization, or directly to You, under certain conditions.

If You make a request, we have one month to respond to You. If You would like to exercise any of these rights or for further information, please contact us at dpo@clunetech.com.