# **Privacy Policy**

This document referred to as the "Policy," outlines how personal information is collected, used, and shared when users (referred to as "you" or "User") visit our website or use the services provided by BlocPay Ltd (referred to as "BlocPay," "We," or "Us"). By using our services, you agree to the collection and use of information as described in this Policy. The personal information we collect is used to improve and provide our services. We are committed to respecting and safeguarding the privacy of all individuals and will process your personal information in accordance with applicable privacy and data protection laws.

This Privacy Policy aims to provide transparency regarding how we collect information on our website. In the event that we modify the purpose for which your Personal Information is collected and used, we will update this Privacy Policy accordingly.

## **COLLECTING PERSONAL INFORMATION**

BlocPay may collect and process the personal information of Users in various ways, such as when they visit our website or use our Services, register on our platform, or provide information for anti-money laundering procedures. We may also obtain information from third-party sources to comply with our legal obligations and verify users' identities. Occasionally, we may process additional data to prevent fraud, money laundering, and other illicit activities, which is necessary for us to perform our contract with you and others and pursue our legitimate interests.

The personal information we collect from you includes your full name, date of birth, email address, telephone number, copy of your identification document, selfie picture or a short video fragment captured during the verification process, proof of address, financial information, IP address, web browser type and version, operating system, a list of URLs starting with a referring site, your activity on our website, and any documents containing personal data required for compliance with financial regulations such as Anti Money Laundering (AML) and Know Your Customer (KYC). We use this information to confirm your identity and mitigate the risks of fraudulent activities via third-party services.

### STORING AND PROTECTING PERSONAL INFORMATION

The scope of this Privacy Policy pertains to personal information that can be utilized to identify a specific individual, as distinguished from anonymous information that cannot. We take the utmost care in securing any information that has the potential to identify you, and regard your safety as our foremost concern. We utilize all available technological means to prevent unauthorized access, disclosure, alteration, loss, or other forms of infringement to your personal information.

Your personal data will be preserved for a minimum of ten (10) years subsequent to the end of the Business Relationship. We undertake reasonable measures to safeguard the privacy and security of your Personal Data from misuse, alteration, unauthorized access, disclosure, destruction, or loss.

#### DISCLOSURE OF THE PERSONAL INFORMATION

In certain circumstances, it may be necessary for us to disclose your personal data to third-party service providers. We may share your information with authorities, other companies for internal administrative purposes, and third-party service providers that we use in connection with our Services, such as analytical services and financial institutions with which we have partnered to jointly create and offer a product.

The following are examples of the types of third parties with whom we share information:

Our partners, who provide identity verification services, including client onboarding and identity verification for politically exposed persons and sanctions;

Banks, credit card companies, and other financial institutions that cooperate with BlocPay Ltd;

Relevant government authorities or law enforcement agencies, where required by us to comply with applicable laws and regulations.

We take reasonable measures to ensure that any third-party service providers with whom we share your personal data are bound by appropriate confidentiality and privacy obligations.

# **GDPR**

BlocPay is committed to complying with the European Union's General Data Protection Regulation (GDPR), which governs privacy and security. The GDPR applies to organizations that collect or target data related to individuals in the EU, regardless of where the organization is located. The regulation came into effect on May 25, 2018, and imposes fines for violations of its privacy and security standards.

As a Controller of Personal Data, BlocPay determines the purposes and means of processing personal data in accordance with the GDPR. When a Visitor accesses the BlocPay platform, BlocPay acts as a Controller for the data listed in the "Automatically Transferred Information Sent from Your Computer or Mobile Device" section. For User data, BlocPay acts as a Controller in accordance with the GDPR as outlined in the "Collection of Users Data" section. The User data is processed by Finchecker, a third-party Processor, for the purpose of conducting necessary KYC/AML procedures.

Finchecker is a certified personal data verification company with sufficient experience and technical means to implement appropriate technology and organizational measures to ensure compliance with GDPR and protect the User's private information. BlocPay has established a data processing agreement with Finchecker to ensure compliance with GDPR, and Finchecker stores private data on GDPR-compliant servers. All data transfers are conducted in accordance with the data processing agreement.

### INTERNATIONAL TRANSFER OF COLLECTED INFORMATION

BlocPay will only transfer the collected information to recipients within the European Economic Area (EEA) in compliance with the GDPR. The EEA countries have the same data protection laws as the country where you initially provided the information. The collected information will not be transferred to any destination outside the EEA. All data transfers will be made in accordance with GDPR, under agreements that include all necessary standard data protection clauses adopted by a supervisory authority. You can obtain a copy of these clauses by sending a request to general@blocpay.io.

Despite any data transfers, BlocPay will fulfil all obligations and liability for any breaches of your personal data rights resulting from the actions of our data processors.

# **COOKIES**

Cookies are small files consisting of letters and numbers that use a unique identification tag. If you agree, they will be stored on your device when you use our website or other services. Cookies are typically stored on your computer's hard drive, which assigns a unique identification to your computer. Information collected from cookies is used by us to evaluate the effectiveness of our site, analyze trends, see what difficulties our visitors may experience in accessing our site, and administer the platform. We need this information to improve the quality of our service.

To gather information about your access to our website and other services, we use cookies. Please click the relevant point on our web page to confirm that you agree to our use of cookies on your device.

#### **USERS RIGHTS**

In accordance with GDPR, this Policy and our use of personal data are designed to uphold the following rights for data subjects:

The right to object to the use of Your personal data for specific purposes;

The right to access the personal data We hold about You;

The right to data portability, which allows You to obtain a copy of Your personal data for re-use with another service or organization;

the right to rectify any inaccurate or incomplete personal data We hold about You;

Rights with respect to automated decision-making and profiling;

The right to be informed about Our collection and use of personal data;

The right to restrict the processing of Your personal data;

The right to be forgotten, which allows You to ask Us to delete any personal data We hold about You.

BlocPay reserves the right to update this privacy policy at any time to reflect changes to our practices or for operational, legal, or regulatory reasons. Users are encouraged to read this page regularly to stay informed about our efforts to protect the personal information we collect.

Please direct any questions or concerns about our Privacy Policy to general@blocpay.io or fill out a contact form.