

# QuantoPay - Privacy Policy

QuantoPay Ltd. a company incorporated in the United Kingdom, having its principal place of business at the Leadenhall Building, 122 Leadenhall Street, City of London, EC3V 4AB, United Kingdom (hereinafter referred to as (“we”, “us” or “our”) are committed to protecting and respecting your privacy.

All undefined capitalized terms that are in this Privacy Policy will have the definitions as provided for under the Terms [\[insert URL\]](#).

This policy, together with our Terms and Conditions [\[insert URL\]](#) (“Terms”) and any other document referenced in either of these documents sets out the basis on which any personal data we collect from you, or that we collect about you, on our website (www.quantopay.com) (“Website”), on the QuantoPay Application (“App”) or when you communicate with us by email, telephone, post or any other means as defined under the Terms will be processed by us.

Subject to the appropriate consents from respective customers, we will be provided with client data from QuantoPay. QuantoPay are an independent data controller who will provide and overview the QuantoPay website and the App for the purposes of applying for a QuantoPay Personal Account and providing account services accordingly. QuantoPay will further act as a processor on our behalf as it relates to this personal data collected. For further information as to the type of personal data we share with QuantoPay and the uses made by them of that data, see that ‘Data Sharing’ section of this Policy below.

If you have any further queries as it relates to any of the principals of this Policy, you can contact us using the contact details provided under the below ‘Contacting Us’ section of this Policy.

## 1. Ensuring lawful use of your personal data

We will only use your personal data where we have a lawful basis to do so. We will usually only use your data for the following cases:

- (a) Where it is necessary for us to enter into and/or perform a contract with you (for example, to create your account and provide our service to you);
- (b) In a way which might be reasonably be expected as a part of running our business and which does not materially impact your interests, rights or freedoms.;
- (c) To comply with our legal and regulatory obligations.;
- (d) In any case where you have provided the appropriate consent for us to use your personal data, for example, where you subscribe to our email or newsletter.

## **2. What Information we collect from you and how we use it**

### **During the application process**

When you apply to create an account with us on the Website or App, we will need to collect the following details about you

- (a) Full name;
- (b) Residential address (current and previous, where applicable);
- (c) Date of birth;
- (d) Gender;
- (e) Email address and telephone number;
- (f) ID document numbers such as passport, driving license or ID card; and
- (g) Image or photo of you.

We will use this information solely for the purpose of processing your application and, if your application is successful, we will further use this information to create and manage your QuantoPay Personal Account and provide you with any products or services that you opt in for. If you have provided the appropriate consents, we will also use specific aspects of the personal data mentioned above, to send you our newsletter via email.

You will not be able to apply to create an account or order products or services without the use of the personal data mentioned above.

Subject to the appropriate consents being granted, we will be provided this information by QuantoPay, and will become the data controller of this information upon receipt.

### **Automated decisions**

As a part of processing your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if:

- (a) Our processing reveals your behavior to be consistent with that of known fraudsters or money launders; or is inconsistent with your previous submissions; or
- (b) You appear to have deliberately hidden your true identity.

You have legal rights in relation to automated decision making if you want to know more about these rights, please contact us using the contact details provided in the 'Contact Us' section below.

### **When you contact us**

When you contact us, we will need to collect personal data about you to verify your identity before we will disclose any confidential information to you. We will be unable to deal with any queries you could have unless you provide us with the information requested, this is in order to

protect both us and you. We further retain the right to collect any other personal data you provide us with when communicating with us, however any such data will only be used for the purpose of dealing with your inquiry.

### 3. How we use data about you

We use your personal data for various purposes connected with your use of the account and any other services we provide. We will only do so where we have a lawful basis to do so. We will usually only use your data for the following purposes:

- (a) Where it is necessary for us to enter into and/or perform a contract with you.
- (b) In a way which might reasonably be expected as a part of running our business and which does not materially impact your interests, rights, or freedom; and
- (c) To comply with our legal or regulatory obligations.

We use your personal data for the following purposes:

- (a) To create and manage your account with us;
- (b) to carry out the required checks on your identity and monitor your use of your account;
- (c) to facilitate your use of your account;
- (d) to communicate with you and provide you with customer support;
- (e) to share information with our suppliers and other third parties where required; and

The table below sets out further information about the purposes for which we use your personal data, with the corresponding methods of collection and legal basis we rely upon for its use.

Purpose	Lawful basis for processing
<p><b>Creating and managing your account</b></p> <ul style="list-style-type: none"> <li>● to apply and create your account</li> <li>● to administer and manage your account</li> <li>● to retain your account profile information</li> </ul>	<p>To fulfil our contractual obligations to you in providing the account and services.</p> <p>Our legitimate interests in operating and improving our services to you.</p> <p>Our legal obligations to comply with regulations that apply to us.</p>
<p><b>Carrying out identification checks</b></p> <ul style="list-style-type: none"> <li>● to carry out the required checks on your identity and enable you to use the App.</li> </ul>	<p>To fulfil our contractual obligations to you in providing the account and services correctly.</p> <p>Our legitimate interests in operating and improving our services to you.</p>

Purpose	Lawful basis for processing
	Our legal obligations to comply with regulations that apply to us.
<p data-bbox="203 411 805 485"><b>Communicating with you and providing you with customer support</b></p> <ul data-bbox="253 506 805 642" style="list-style-type: none"> <li data-bbox="253 506 805 537">• to investigate your complaint or query</li> <li data-bbox="253 541 805 642">• to inform you of important information or changes to your terms and conditions</li> </ul>	<p data-bbox="828 428 1393 501">To fulfil our contractual obligations to you in providing the account and services.</p> <p data-bbox="828 518 1349 592">Our legitimate interests in operating and improving our services to you.</p> <p data-bbox="828 609 1289 682">Our legal obligations to comply with regulations that apply to us.</p>
<p data-bbox="203 701 805 846"><b>Sharing data with our suppliers and other third parties (such as banking institutions, payment facilitators, and card operators) where required</b></p> <ul data-bbox="253 867 756 972" style="list-style-type: none"> <li data-bbox="253 867 756 972">• see the section <i>Disclosures of your information</i> section for more information</li> </ul>	<p data-bbox="828 718 1393 791">To fulfil our contractual obligations to you in providing the account and services.</p> <p data-bbox="828 808 1349 882">Our legitimate interests in operating and improving our services to you.</p> <p data-bbox="828 898 1289 972">Our legal obligations to comply with regulations that apply to us.</p>

**4. The information we receive from other sources**

We are also working closely with certain third parties (including, but not limited to, identification verification agencies, marketing agencies and fraud prevention agencies) and where we have any contractual relationship we will receive specific information about your from them for any purpose as it relates to our relationship with them.

**5. Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, unless we are restricted by any law or regulation, we will notify you and we will explain the legal basis which allows us to do us.

**6. Disclosures of your information**

We will disclose your information to:

- (a) Fraud prevention agencies, identity verification services and other organisations for the purposes of preventing fraud and money laundering. For example, we share your personal data with CIFAS when we carry out our fraud prevention and anti-money laundering checks and if we suspect that you have committed fraudulent activity;
- (b) Our group companies, for the purposes of processing transactions and providing services relating to your account;
- (c) Third party service providers and agents, in order to allow us to manage our business and to provide the products and services to you.
- (d) In the event that we sell or buy any business or assets, to the prospective seller or buyer of such business or assets;
- (e) A third party 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 and other agreements; or to protect the rights, property, or safety of QuantoPay, our customers or others.

## **7. Protecting your information**

Your data is secured by encryption, firewalls and Secure Socket Layer (SSL) technology. This is industry standard encryption technology which manages the security of messages transmitted across the internet. When we receive your data, we store it on secure servers which can only be accessed by us. We store your passwords using one way encryption which means we do not know what your password is.

## **8. Storing your data within and outside the EEA**

Our third-party data host provider uses servers located in the UK and Europe to store personal data. As a result, when you use the Website or App to make transactions or update your account information, your personal data may be transferred to the UK which is located outside of the European Economic Area and so is not governed by European data protection laws.

However, we have entered into EU standard contractual clauses with any third party or group company in order to safeguard personal data which is processed or stored in the UK. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy when it is transferred, stored or processed in this way.

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose the EU standard contractual clauses adopted by the European

Commission on the recipients of that data in order to safeguard personal data when it is accessed from outside of the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

More information about the EU Standard Contractual Clauses is available here <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32010D0087>.

## **9. Retention of your data**

We will retain your personal data for as long as you continue to use our services. Thereafter, we may retain your information for an additional period as is permitted or required under applicable laws. For example:

- (a) If you hold an account with us, your personal data will be retained for five years after the closure of your account to comply with our obligations under anti-money laundering regulations;
- (b) If you make a complaint, your personal data relating to that complaint will be retained for five years from the resolution of that complaint to defend against legal claims; and

## **10. Your rights**

Data protection laws provide you with the following rights to:

- (a) request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- (b) request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- (c) request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);
- (d) request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it; and
- (e) request a copy of your personal data which you have provided to us, in a structured, commonly used and machine-readable format and the right to transfer it, or to require us to transfer it directly, to another controller.
- (f) object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation

- which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- (g) decline to be subject to a decision based solely on automated processing.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights above). However, we reserve the right to charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we further can refuse to comply with the request in such circumstances.

In certain circumstances we will need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

If you are unhappy about how your personal data has been used, please refer to our complaints procedures which is available by contacting us. You also have a right to complain to the supervisory authority, which in the United Kingdom is the Information Commissioner's Office <https://ico.org.uk/a> who regulate the processing of personal data.

## **11. Contacting us**

If you have any questions about this policy, you can contact us by using the 'Contact us' facility on the Website or App or in the following ways:

**By post at:**

QuantoPay data Officer

**By email at:** [info@quantopay.ro](mailto:info@quantopay.ro)

## **12. We use cookies on our website**

We use cookies to analyse how you use our website. Please read the Cookies Policy for more information about cookies.