

# Privacy Policy

## 1. General provisions

- 1.1. Your service provider and data controller is Verified Payments, UAB (legal code 304576936, registration address Gedimino av. 20, LT-01103 Vilnius, Lithuania, correspondence address Rinktines str. 5, LT-09234 Vilnius, Lithuania) (brand name Verifo), an e-money institution acting under e-money license No. 27 issued by the Bank of Lithuania on 13/02/2018. You can find useful information about Verifo here. Activity of Verifo is supervised by the Bank of Lithuania.
- 1.2. DCC Data Communication Company LTD (hereinafter - "Interbanx") company code HE367993, registered address Loucias Nicolaidou STR 16 A, Ayia Fyla, 3117 Limassol, Cyprus, helps customers to reach Verifo services and create legal relationship between Clients and Verifo. DCC Data Communication Company LTD acts as clients introducer to Verifo therefore it acts as data controller as well. (hereinafter – DCC Data Communication Company LTD and Verifo collectively the "Parties").
- 1.3. Parties respect the right of all users of the website [www.interbanx.net](http://www.interbanx.net) to the protection of personal data and undertake to ensure it.
- 1.4. This Privacy Policy governs the basic principles and procedures for the collection, processing and storage of personal data of users of the [www.interbanx.net](http://www.interbanx.net) website.
- 1.5. Parties processes customers' personal data in accordance with the 2016 April 27 Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter the Regulation), provisions of Law on the Legal Protection of Personal data of the Republic of Lithuania, and other directly applicable legal acts regulating the protection of personal data, as well as the instructions of the data protection supervisory authorities.

## 2. Terminology

DCC Data Communication Company LTD	DCC Data Communication Company LTD with company number HE367993, registered address Loucias Nicolaidou STR 16 A, Ayia Fyla, 3117 Limassol, Cyprus.
Verifo	Verified Payments JSC is a limited liability company incorporated in Lithuania with company number 304576936 and registered address at Gedimino pr. 20, LT-01103, Vilnius, Lithuania.
Services	Services shall mean issuance, holding and redeeming of E-money, provision of the Payment Services and other services specified on the DCC Data Communication Company LTD Website through which services are provided.

Verifo system	Verifo System shall mean platform developed by Verified Payments UAB to provide payment services.
Reglament	2016 April 27 Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation).
Personal data protection law	Republic of Lithuania Personal data protection law.
Data subject	Individual - a Verifo customer or a person related to him / her, whose personal data is processed.
Data processor	A natural or legal person, public authority, agency or other body that processes personal data on behalf of Parties. The data controller acts in accordance with the instructions of the data controllers.
Data controller	It is a natural or legal person, public authority, agency or other body that, alone or together with others, sets the purposes and means of data processing (in this policy, the controllers are understood as “Verifo” and “DCC Data Communication Company LTD”).
Personal data	Any information about an identified or identifiable natural person (data subject); "identifiable natural person" means a person who can be identified, directly or indirectly, in particular by an identifier such as name, personal identification number, location and internet identifier or by one or more physical identifiers of that natural person, characteristics of physiological, genetic, mental, economic, cultural or social identity.
Data processing	Any operation or sequence of operations on personal data or sets of personal data by automated or non-automated means, such as collection, recording, sorting, systematisation, storage, adaptation or modification, retrieval, access, use, disclosure by transfer, distribution or otherwise use them, as well as collation or merging with other data, restriction, deletion or destruction.

Direct marketing	Any marketing that relies on direct communication or distribution to individual consumers, rather than through a third party such as mass media. Mail, email, social media, and texting campaigns are among the delivery systems used.
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### **3. For what purposes is personal data processed**

- 3.1. When providing services - by concluding a contract with the client in order to ensure its successful execution.
- 3.2. In order to perform its duties in accordance with the requirements of legislation:
  - 3.2.1. In compliance with the requirements of legal acts and international agreements related to the implementation of the “Know Your Customer” principles;
  - 3.2.2. Providing data to competent authorities on request;
  - 3.2.3. In order to prevent possible money laundering and terrorist financing, to identify, investigate and report on such activities;
  - 3.2.4. Determining the financial sanctions that may be applied to the client;
  - 3.2.5. Identifying potential client involvement in the policy;
  - 3.2.6. For identification purposes;
  - 3.2.7. To safeguard other legitimate interests of the Parties in the management of the organization and risks.
- 3.3. For direct marketing purposes, promotional and direct marketing communications (such as service announcements) may be sent to customers who have consented to receive direct marketing and promotional offers from Parties. Such Customers may receive Parties newsletters and direct marketing communications through selected means of communication. Parties may advertise its services to existing customers on the basis of a legitimate interest.
- 3.4. To ensure security, the provision of financial services is subject to criminal activity. In order to mitigate the related risks, we process certain data - we monitor operations and ensure the security of our IT systems:
  - 3.4.1. The above processing operations are performed in accordance with the requirements of applicable laws and regulations or the legitimate interest of the Parties, which may include mitigating the risks of any Verifo systems and identifying deficiencies in the databases.
  - 3.4.2. Security measures are periodically tested and updated as appropriate.

### **4. What data is collected / processed**

- 4.1. Data provided by the customer or his representative when applying for the provision of services:
  - 4.1.1. Identity: name, surname, personal identification number or other unique sequence of characters assigned to the person for identification purposes, gender, date of birth, identity document number, copy of identity document, nationality or country that issued the identity document, country of residence, employer, identification number in Verifo system, account number in the Verifo system, personal image, and other identifying information;
  - 4.1.2. Contact information: residential address, registration address, telephone number, e-mail mail address;

- 4.1.3. Data is collected / processed in accordance with the “Know your customer” principle: monthly income, institutions where bank accounts are held, account number in the Verifo system, transactions performed on the accounts; Information on accounts held with other financial institutions, verification of customer information in public and non-public registers, employer, positions held, interests in Parties services, payments and other transaction information, account turnover, source and origin of funds, countries to / from which transactions are made, information on participation in political activities, other information on monitoring the client's actions;
- 4.1.4. Verifo payment card information: card number, CVV / CVC code, code of payment card, PIN code, expiration dates.
- 4.2. Data provided by a person indirectly by visiting [www.interbanx.net](http://www.interbanx.net):
  - 4.2.1. Parties collects and processes this personal data of the customer, which he provides indirectly by visiting the website [www.interbanx.net](http://www.interbanx.net). The following data is automatically collected from the computers and / or mobile devices you use when you log in to the site: device operating system, IP addresses and times of connections, browser used by the user and its version, device type, data on service usage, eg data related with web browsing.

## **5. How long data is processed**

- 5.1. In Privacy Policy’s 4.1.1.; 4.1.2. and 4.1.3. clauses referred personal data is processed by Verifo for 8 years from the date of termination of transactions or business relationships with the client, may be extended by a reasoned decision of the competent authority for 2 years.
- 5.2. In Privacy Policy’s clause 4.2.1. mentioned personal data is collected automatically by DCC Data Communication Company LTD while visiting [www.interbanx.net](http://www.interbanx.net) and is immediately depersonalized.

## **6. Who has access to the personal data being processed**

- 6.1. Access to your personal data has employees of the Parties and authorized parties data processors.
  - 6.1.1. Authorized employees of DCC Data Communication Company LTD shall have read only access to personal data collected/processed in chapter 4 of this Privacy policy.
- 6.2. Parties employees are granted access to the customer's personal data only if they undertake to observe confidentiality and if necessary to perform their duties.
- 6.3. Parties use data processors only in cases where it is not possible to properly process the customer's data itself:
  - 6.3.1. Data processors shall be granted access to customer data only after assessing the applicable data processing procedures and their compliance with the provisions of the applicable legal acts.

## **7. Rights of Data subjects**

- 7.1. To get acquainted with the processed personal data, - at the customer's request, we provide the processed personal data, together with the purposes of data processing, data categories, information on data recipients, etc..

- 7.2. Object the processing of personal data if the processing of personal data is based on a legitimate interest, including profiling for direct marketing purposes (for example Data subject can refuse to receive marketing offers or participation in surveys).
- 7.3. Request a restriction on the processing of personal data in accordance with applicable law, (eg the customer may request the deletion of the data if the processed data is redundant, the data is processed for direct marketing purposes, etc.).
- 7.4. Request the correction of personal data if they are incorrect, incomplete or inaccurate.
- 7.5. Request for erasure of personal data (right to be forgotten), this right does not apply if the personal data whose erasure is requested are also processed on another legal basis, such as processing necessary for the performance of a contract or an obligation under applicable law.
- 7.6. Receive personal data provided by the Customer to the Parties and transfer such data to another data controller, or require Parties to transfer such personal data directly to another data controller when technically possible.
- 7.7. Revoke consent to allow processing of your personal data (for example, revoke consent for direct marketing purposes).
- 7.8. Disagree with the application of a fully automated decision, including profiling, if such a decision has legal consequences or similarly significant effects.
- 7.9. Upon receipt of the customer's request, and after the customer has duly confirmed his / her identity, Parties will assess whether the customer's request can be satisfied.
- 7.10. The customer should send the request by e-mail. by e-mail [info@verifo.com](mailto:info@verifo.com) or [info@dccpayments.com](mailto:info@dccpayments.com), or by sending a mail to Verifo or to DCC Data Communication Company LTD correspondence address.
- 7.11. If the customer considers that his rights as a data subject have been violated or has questions regarding the processing of personal data, he may submit a request to assess the situation or a complaint to the Parties Data Protection Officer by e-mail [info@verifo.com](mailto:info@verifo.com) or [info@dccpayments.com](mailto:info@dccpayments.com). You can also file a complaint with the State Data Protection Inspectorate or you can go to court.

## **8. Data processing for direct marketing purposes**

- 8.1. Data is processed for direct marketing purposes only with the prior consent of the customer and in accordance with the provisions of the applicable legal acts and the Regulation. Newsletters and direct marketing communications can be sent to the customer via email, mail and / or inquire about the quality of existing services.
- 8.2. We process the following customer personal data for direct marketing purposes: name, email address.
- 8.3. Your personal data is stored for direct marketing purposes until you refuse to receive direct marketing communications.
- 8.4. The customer has the right to object at any time free of charge to the processing of his personal data for direct marketing purposes. To exercise this right, the customer should contact Parties. The customer can also unsubscribe from newsletters and all other promotional and marketing messages by clicking on the email. the reference in the letter or in accordance with the other instructions given in such a direct marketing communication.

## **9. Provision of data to third parties**

- 9.1. Personal data is transferred to recipients such as:

- 9.1.1. Public bodies and institutions, other persons performing the functions assigned to them by law (for example, law enforcement institutions, bailiffs, notaries, tax administration, Parties supervisory authorities, institutions engaged in financial crime investigation);
  - 9.1.2. Auditors, legal and financial consultants; Authorized Data Processors of the Parties;
  - 9.1.3. Debt collection companies to which claims on the Client's indebtedness are transferred, courts, out-of-court dispute resolution institutions and bankruptcy administrators;
  - 9.1.4. Participants and / or countries involved in national, European and international payment systems, such as SWIFT;
  - 9.1.5. Other persons involved in the provision of Services, such as archiving, postal service providers, providers of customer services for which the customer orders electronic invoices, vendors.
- 9.2. The customer's data may be provided to third parties only on a legal basis, which may include the customer's consent, legal requirement, performance of law enforcement functions, etc. Parties may provide Customer's personal data to data processors who provide services to Parties and process Customer's personal data on behalf of Parties only to perform the data processing function necessary to ensure the successful provision of the Services. Data controllers are not entitled to use your data for other purposes.

## **10. Protection of processed data**

- 10.1. Protecting Customer Data is critical for the Parties. Therefore, every effort is made to protect data from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction.
- 10.2. Parties are carefully selecting Vendors, they are required to use appropriate measures to protect customer confidentiality and ensure the security of personal information.
- 10.3. It should be noted that the security of information transmission, via the Internet, e-mail or mobile communication may sometimes be unsecured for reasons beyond Parties, so the customer must be careful when providing confidential information outside the Verifo system.

## **11. Final provisions**

- 11.1. Changes to the Privacy Policy:
  - 11.1.1. Parties reserve the right to unilaterally change this Privacy Policy at any time by notifying the customer of the changes on the [www.interbanx.net](http://www.interbanx.net) website, informing the customer by e-mail. By post or Internet bank message no later than 30 (thirty) calendar days before such changes take effect;
  - 11.1.2. If you have any questions related to the processing of personal data or the use of cookies, please contact us in the most convenient way for you: write to DCC Data Communication Company LTD – address: Loucias Nicolaidou STR 16 A, Ayia Fyla, 3117 Limassol, Cyprus or to Verifo – address: Gedimino av. 20, LT-01103 Vilnius Lithuania; email [support@interbanx.net](mailto:support@interbanx.net) or [info@verifo.com](mailto:info@verifo.com).