
Privacy Policy

1 INTRODUCTION

Credit BlauStein Limited collects data in order to operate the Credit BlauStein Payment Services effectively. This Privacy Policy describes the information we collect and explains how we collect, share, use and protect the information you share with us when browsing the Credit BlauStein Website and/or registering the User Account with us.

This Privacy Policy forms an integral part of the User Agreement and applies:

- to the website features and services provided to you when you visit Credit BlauStein Website or use the System;
- when you apply to use and/or use our Payment Services; and
- to e-mail, other electronic messages including SMS, telephone, web chat, website/portal and other communications between you and Credit BlauStein.

Please read this Privacy Policy carefully to understand our policies and practices regarding your personal, commercial and other types of sensitive information and how we will treat it. In addition, please note that Credit BlauStein provides services to both individual consumers and businesses, and this Privacy Policy applies to both and should be read and interpreted accordingly.

2 INFORMATION WE MAY COLLECT FROM YOU

2.1 Collecting your information

We collect the following information through the following means:

Information you give us: In order to open the User Account, Credit BlauStein gathers and processes the following information about you:

- In the case of a legal entity: company name, company address, commercial register number, telephone number, e-mail address, details of all involved persons (shareholders, directors, authorised persons), and bank account information.
- In the case of an individual person: full name, address, date and place of birth, nationality, phone number, e-mail address, and bank account or credit card information.

If we cannot verify the information that you provide, we may ask you to send us additional documents, such as copy of identity card, driving license and proof of address in the case of an individual person, and in the case of a legal entity, identity card, proof of address of all involved persons (shareholders, directors, authorised persons), and other company details.

Other commercial and/or identification information may also be required if you send or receive certain high-value transactions or high overall payment volumes through us. For the purpose of complying with our anti-fraud and anti-money laundering obligations, we may also require you to provide us information related to you from third parties, including information about your financial history, and decisions of local district courts, bankruptcy, information provided by credit bureaus and anti-fraud agencies, at any time when we may deem it necessary to minimize financial risks and prevent fraud.

Information we collect about you automatically:

- **Transaction Information:** We may collect, store, and process the personal, commercial and other types of sensitive data or information about the company provided by you during your transactions, as well as other data automatically transmitted to us in the process of your use of the System, and transfer such as data to third parties for the purpose of fulfilling the User Agreement or additional agreements with such third parties, as well as all other transactions with your information permissible under applicable laws.
- **Website Traffic Information:** We automatically receive the web address of the site that you came from or are going to, and the IP address of the computer or device that you are using to access Credit BlauStein Website. We also collect information on which pages of Credit BlauStein Website you visit, IP address, the type of browser you use and the times you access our Credit BlauStein Website.
- **Cookies:** When you access Credit BlauStein Website or use our Payment Services, we may place small data files on your computer or other device (unless you purposely restrict this option in your browser). These data files may be cookies, pixel tags, “Flash cookies”, or other local storage provided by your browser or associated applications (collectively “Cookies”). We use Cookies to recognise you if you return to this site using the same computer or device, content and advertising, help ensure that your account security is not compromised, mitigate risk and prevent fraud, and to promote trust and safety across Credit BlauStein Website and our Payment Services.

Email and Other Communications: When using the System or contacting and submitting requests by phone, e-mail, or via other means of communication, we retain such information and our responses to you in the records of your account.

Information about other people: if you provide us with information about other people, you must have informed them in advance (for example, by giving them this Privacy Policy) and must ensure you have the right to do so. Your failure to ensure respect of the rights of third parties shall in no case create obligations and/or liabilities for us.

3 USE OF COLLECTED INFORMATION

We may use the available information related to you for the following purposes:

- Rendering Payment Services requested by you;
- Executing your Payment Orders related to sending and receiving payments, as well as making transactions using our Payment Services;
- Notifying you of changes in the Payment Services, the System, the User Agreement, etc.;
- Fulfilling the requirements of the applicable laws and regulations, in particular, those related to anti-money laundering laws and KYC (Know Your Customer) procedures;
- Verifying your financial status and identity, including during account creation and password reset processes;
- Carrying out verification procedures to manage risk, or to detect, prevent fraud and money laundering or other potentially illegal or prohibited activities;
- Providing Payment Services to you, including customer support services (e.g. responding to your questions, requests, comments, and complaints);
- Increasing the security of the Payment Services and managing and protecting our information technology infrastructure;
- Providing the Credit BlauStein Website's content and layout in a manner that is most efficient for you and your computer or devices;
- Providing to you the services requested, or services that we believe may interest you;
- Improving the Payment Services by customising your user experience;
- Providing you with information about our Payment Services;
- Carrying out Credit BlauStein's internal procedures and processes, such as audits, analytical data processing, performance and quality assessment as to the Payment Services provided, etc.

4 DISCLOSURE OF INFORMATION

- 4.1 We do not provide your data to any third parties for marketing purposes without your express permission and shall only disclose this information in the limited circumstances described below.
- 4.2 We do not disclose information which could identify you personally, to anyone except as described in this

Privacy Policy and for the purposes described herein, including:

- Disclosing information on substantiated requests from the police and other law enforcement agencies, security forces, regulatory authorities, self-regulatory authorities or organizations and other third parties with the authority to obtain such information;
- Disclosing necessary information in response to the requirements of agents and third parties under an agreement with Credit Blaustein to fulfil obligations to you (including, but not limited to, acquirers, credit card associations, and Credit BlauStein's affiliated parties, etc.) and on the following conditions: 1) they are aware of the confidential nature of such information; 2) they take adequate measures to protect confidential information from unauthorized access and use;
- On the same conditions as above disclosing information to Credit BlauStein's group companies, payment processors, investors, acquirers, partners, and auditors;
- Disclosing information in the course of information exchange with other companies and organizations for the purposes of anti-fraud protection, financial risk assessment and management, customer service, and helping third parties comply with anti-money laundering and counter-terrorist financing verification requirements;
- Disclosing information when Credit BlauStein has reason to believe that you violate the User Agreement or when Credit BlauStein deems such information disclosure reasonable and appropriate to investigate, prevent, or take measures against unlawful activities, suspected fraudulent activities, potential threats to any person's physical security, other illegal activities, violations of the User Agreement, or if it is required by law;
- Disclosing information in other circumstances in accordance with the provisions of the User Agreement and the applicable laws.

- 4.3 No provision contained in this Privacy Policy shall restrict your right or the right of Credit BlauStein to disclose any confidential information in accordance with any court order or decisions, subpoena, warrant or any other legitimate obligation or requirement under effective laws and regulations if such information disclosure is mandatory and on the condition that, to the extent possible, you or Credit BlauStein is notified of such information disclosure in advance.
- 4.4 All confidential information shall remain the property of the Party disclosing such information; no rights or licenses are granted with regard to such confidential information.
- 4.5 Either Party shall return to the other Party and/or securely destroy all confidential information on the other Party's written request, unless such documents have to be stored under the effective laws and regulations, and if required, shall confirm in writing, with the authorized signature, that such confidential information was duly returned or securely destroyed.
- 4.6 You have the right to request that Credit BlauStein restrict third parties' access to your data for marketing purposes, provided that it does not contradict the applicable laws and the User Agreement, by sending a relevant written request to Credit BlauStein using the contact details available on Credit BlauStein Website.

5 PROTECTION OF INFORMATION

- 5.1 We shall ensure confidentiality of any and all information received in the course of fulfilling our obligations under the User Agreement, with the exception of the cases explicitly provided for in the User Agreement.
 - 5.2 We give limited access to your information only to those employees who require it to provide services to you or perform their professional duties.
 - 5.3 As stipulated in other sections of the User Agreement, you are responsible for ensuring confidentiality of your information, and the security of your User Account relies on your protection of your login details. We shall not be liable for transactions made as a result of improper storage or loss of information on your part.
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6 WHERE WE STORE YOUR INFORMATION

- 6.1 We, our service providers, and other parties with whom we may share your personal, commercial and other types of sensitive information may process your personal, commercial and other types of sensitive information in territories that are outside the European Economic Area ("EEA") or otherwise outside of the territory in which you reside. It may also be processed by staff operating outside the EEA or the territory in which they collected who work for us. Such staff may be engaged in, among other things, the fulfilment of Payment Orders, the processing of payment details and support services in provision of the Payment Services. These countries may have data protection standards that are different to those in which you reside.
 - 6.2 In the circumstances mentioned above, we will take appropriate and reasonable steps to protect your personal, commercial and other types of sensitive information in accordance with the provisions of this Privacy Policy and applicable data protection laws; including through the use of any appropriate safeguards required by law to ensure that any international data transfers are lawful.
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7 HOW LONG WE RETAIN YOUR INFORMATION

- 7.1 The periods for which we retain your personal, commercial and other types of sensitive information are determined based on the nature and type of information, the Payment Service and the country in which they are provided, as well as any applicable local legal or regulatory requirements. In general, once no longer needed, your information will be deleted.
 - 7.2 We only retain your information for as long as necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use our Payment Services, for instance if this is necessary to meet our legal obligations, such as retaining information for tax, accounting, and compliance purposes.
 - 7.3 When determining the relevant retention periods, we will take into account the following factors:
 - our contractual obligations and rights in relation to the information involved;
 - legal obligation(s) under applicable law to retain data for a certain period of time;
 - our legitimate interest where we have carried out a balancing test (see section 9 below);
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- statute of limitation under applicable law(s);
 - (potential) disputes;
 - If you have made a request to have your information deleted; and
 - Guidelines issued by relevant data protection authorities.
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8 YOUR DATA PROTECTION RIGHTS

- 8.1 The applicable laws on personal, commercial and other types of sensitive data protection give you the right of access to any information that we hold about you. We may ask you to verify your identity and for more information about your request.
- 8.2 In certain circumstances, you may ask us to edit or delete your personal, commercial and other types of sensitive information stored by us and/or on Credit BlauStein Website. You may also object to its processing or temporarily restrict its processing while exercising your other rights. In addition, you can request to transfer certain of your personal, commercial and other types of sensitive information to another service provider (also known as “data portability”).
- 8.3 When you give us consent to use your personal, commercial and other types of sensitive information, you can withdraw it any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal, commercial and other types of sensitive information conducted in reliance on lawful processing grounds other than consent.
- 8.4 Please be advised that depending on the country from where you use the Payment Services, not all rights mentioned in this Privacy Policy may be available to you. Also, there might be cases where these rights cannot be enforced, for instance if it is required by the law. Similarly, if you ask us to delete your personal, commercial and other types of sensitive information or withdraw you consent for the processing of your personal, commercial and other types of sensitive data, we cannot continue providing you our Payment Services.
- 8.5 You always have the right to complain to a data protection authority about our collection and use of your personal, commercial and other types of sensitive information. For more information, please contact your local data protection authority. Also, you can commence a court action to claim compensation for damage or distress caused by our failure to comply with data protection legislation.
- 8.6 If you wish to know more about your rights, or you wish to exercise them, you can reach us at the details provided in the Contact Us section.
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9 LEGAL BASIS FOR PROCESSING

- 9.1 We will only process your personal, commercial and other types of sensitive information where we have lawful authority to do so. Such laws vary across different territories and further specific information is available on request. In general, Credit BlauStein will either process:
- On the basis of your consent;
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- Where necessary for the performance of, or entry into, any agreement we have with you, for example in order to provide you with the Payment Services you have subscribed;
 - Where Credit BlauStein has a legitimate interest to process data, subject to such processing not overriding your own rights and freedoms in objecting to such processing;
 - Where Credit BlauStein has a legal obligation to collect your personal, commercial and other types of sensitive information or otherwise needs your personal, commercial and other types of sensitive information to protect your vital interests or those of another person; or
 - Where Credit BlauStein is legally required to hold information on you to fulfil our legal and regulatory obligations, such as disclosure to public authorities, regulators and investigations.
- 9.2 We carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests before we go ahead with such processing.
- 9.3 If you have questions or want to find out more about the legal basis on which we collect and use your personal, commercial and other types of sensitive information, please contact us using the contact details provided under the Contact Us section below.
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10 AUTOMATED DECISION MAKING

We do not carry out automated decisions as there is human intervention in all our processing of personal, commercial and other types of sensitive data.

11 NOTIFICATION OF CHANGES

We reserve the right to change, modify or otherwise alter this Privacy Policy at any time for whatever reason. We will notify you of any changes by sending an e-mail to the primary e-mail address registered with your User Account. We will also post notice of the changes on Credit BlauStein Website where you can view the current version of this Privacy Policy.

12 CONTACT US

All comments, queries and requests concerning to our use of your information are welcomed. If you wish to receive further information, you can reach by sending a message through the "Contact Us" facility on the Credit BlauStein Website, by sending email to info@creditblaustein.com, or by calling + 44 7830 30 90 70. This Privacy Policy was last revised on 5th July 2018.