Terms & Conditions **Privacy and Policy**

Privacy and Policy

This Privacy Policy describes how SaintPay S.R.L (“we”, “us”, “our”, “ourselves”, “SaintPay”) collects and processes personal data of our potential, existing or former clients, our client's employees, or other parties (“you”, “your”) through the SaintPay websites and applications that reference this Privacy Policy. By using the services provided by us (“Services”), you are consenting to the collection, storage, processing, and transfer of your personal data as described in this Privacy Policy.
SaintPay S.R.L is a cryptocurrency exchange operator, established under the laws of the Republic of Italy, registration number 12902640965, having its registered office at Milano (Mi) Via Del Lauro 9 Cap 20121. SaintPay is the data controller for personal data collected and processed in connection with the provision of Services.

SCOPE OF OUR PRIVACY POLICY

1.1. This Privacy Policy describes how SaintPay collects, uses, stores, shares, and protects your personal data whenever you use Services through our website (“Website”), our mobile app (“Mobile App”) or by corresponding with us (for example by email or by filling messaging forms on the Website).

1.2. Personal data collected by us are processed in accordance with the Codice In Materia Di Protezione Dei Dati Personali in the Republic of Italy, the EU General Data Protection Regulation No. 2016/679 (“GDPR”), and other legal acts. All employees, agents, and employees of the agents of SaintPay who know the secret of personal data must keep it safe even after termination of the employment or contractual relationship.

1.3. For the processing of personal data, SaintPay may engage data processors and/or, at its sole discretion, hire other persons to perform certain functions on behalf of us. In such cases, we shall take necessary measures to ensure that such data is processed by th

personal data processors in accordance with our instructions and applicable legislation. SaintPay shall also require the personal data processors to implement appropriate measures for the security of personal data. In such cases, SaintPay shall ensure that such persons will be subject to the non-disclosure obligation and will not be able to use this information for any other purpose, except to the extent necessary to perform the functions assigned to them.

1.4. We assume that you have carefully read this document and accepted it. If you do not agree with this Privacy Policy, then you should refrain from using our Services or opening an account. This Privacy Policy is an integral part of our Terms of Use.

1.5. We may change this Privacy Policy from time to time. We will post any Privacy Policy changes on the Website and additionally send you an email informing about changes made. Continued use of SaintPay's Website and/or Services implies your acceptance of the revised Privacy Policy.

1.6 SaintPay respects the individual's right to privacy and makes all reasonable efforts to ensure the security and confidentiality of personal data and other information processed on our Website and Mobile App.

1.7. You can visit our Website without providing any information about yourself, however, if you want to open an account in order to access our services (“Account”), and/or use other payment services offered by us, we will ask you to provide personal data indicated in the system and to carry out established identification procedures.

1.8. SaintPay reserves the right, at its sole discretion to alter the provisions of the present Privacy Policy, therefore, when visiting this Website, you have a responsibility to make sure that you are familiar with the latest version of the Privacy Policy that applies to you at the time you are visiting the Website.

PERSONAL DATA WE COLLECT

2.1. General To provide you with SaintPay Account and Services thereof, SaintPay is bound by law to establish and verify your identity prior to entering financial services transactions with you, also, at the time of the provision of the Services, to request further information, as well as assess and store this information for the retention period set out by legislation. Taking this into account, you must provide correct and complete information. Personal data is collected and used during 3 principal steps: registration, identity verification and the use of SaintPay Account

and Services.

2.2. Personal data categories The personal data we collect can be grouped into the following categories:

Type of information	Personal data
1.Basic personal data	First, last, middle, maiden names, job title, etc.
2.Identification information	Name, surname, date of birth, personal code, address, copy of identification document (ID/Passport/Itinerary document) and its details (expiry date, number), nationality, occupation, evidence of beneficial
	number), number of shares held, voting rights or part of share capital, title, account number, photo, signature.
3.Monetary operation details	History of transactions (currency, amount, location, date, information of payer and payee, i.e., name, surname, account number, purpose of transaction, number of transactions, message content).
4.Details of your activities in our Mobile App	Login history, history and other information of your actions while using Mobile app, device geolocation, IP address, device info (name, model, operating system, unique ID).
5.Details of your activities in your website account	History of the actions performed in your Website account, technical information, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information (e.g., login time), browser type and version, time-zone setting, operating system and platform, type of device you use, unique device identifier.
6.Details of your activities in our website	History of the actions performed in our Website, technical information, including the internet protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, operating system and platform, type of device you use.
7.Details of your existing bank account/-s	Financial institution account number, IBAN number, payment card number, date of issue and expiry date.

Type of information	Personal data
8.Information related to legal requirements	Data that enables us to perform anti-money laundering requirements and ensure the compliance with international sanctions, including the purpose of the business relationship and whether you are a politically exposed person and other data that is required to be processed by us in order to comply with the legal obligation to “know your client” (collected data will differ depending on the client's risk score). (KYC)
9.Information obtained and/or created in order to fulfil the requirements of applicable legislation	Data that we are required to provide to public authorities, such as tax administrators, courts, including data on income, payments and other information held by us.
10.Contact details	Phone number, e-mail, residential address, correspondence address for delivery of Debit Card (if different from residential address).
11.Communication details	Date of the e-mail, letter, subject, the content of the correspondence, messaging history, including, but not limited to, claims and complaints made by you, our responses to you, names of messages, the dates of messages.
12.Information about your behaviour	Your clicks, visited sections, interests, product or service preferences, other information about your behaviour and your activity on our website, Mobile App.
13.Special category data	Biometric data.

PURPOSES AND LEGAL BASIS FOR PERSONAL DATA PROCESSING

Purpose	Legal basis	Categories of personal data
1.To register you on our Website or Mobile App/ to open your Account	Your consent.	Contact details.

Purpose	Legal basis	Categories of personal data
2.To download the Mobile App	Your consent.	Full name and email address.
3.To open your Account	.Taking necessary steps before conclusion of the contract and/or conclusion of the contract; .Legal obligations.	.Basic personal data; .Identification and other background verification data; .Contact details; .Other personal data needed (in order to evaluate the possibility of providing Services).
4.To perform the contract concluded with you, including (but not limited to) provision of the Services	.Performance of the contract; .Legal obligations.	Basic personal data; .Identification and other background verification data; .Monetary operation details; .Details of your activities in your website account; .Details of your activities in our Mobile App; .Details of your existing bank account/-s; .Information related to legal requirements; .Contact details; .Communication details; Other personal data needed (in order to evaluate the possibility of providing services).
5.To carry out ongoing Client Due Diligence (CDD) and manage ML/TF risk, identify, investigate and report suspicious transactions and potential market abuse	Legal obligations.	.Basic personal data; .Identification and other background verification data; .Monetary operation details; .Details of your existing bank account/-s; .Information related to legal

Purpose	Legal basis	Categories of personal data
		requirements; .Contact details. (Scope of the processing of personal data depends on the specific operation being investigated)
6.To enable us to comply with anti-money laundering and anti-terrorist financing requirements and to enforce compliance with the requirements relating to sanctions (including Know Your Customer ("KYC")obligations, such as to determine the purpose of the business relationship and whether you are a politically exposed person, as well as the source of funds)	Legal obligations.	.Basic personal data; .Identification and other background verification data; .Monetary operation details; .Details of your existing bank account/-s; .Information related to legal requirements; .Contact details; Other personal data needed.
7.To comply with other legal requirements under applicable legislation in areas such as the provision of payment services (including client ongoing client due diligence (CDD), financial markets and financial services, market abuse, personal data protection, accounting and taxation	Legal obligations.	.Basic personal data; .Identification and other background verification data; .Information obtained and/or created in order to fulfil the requirements of applicable legislation; .Contact details; .Other personal data needed. (the scope of processed personal data depends on the client's risk category, specific situation and may include all of the above categories of personal data or a part of this personal data)
8.To verify your identity	Your consent.	.Special category data; .Identification and other

Purpose	Legal basis	Categories of personal data
		background verification data.
9.For security purposes, to investigate possible fraud or other violations of our Services	.Performance of the contract; .Legitimate interest; .Legal obligations.	.Basic personal data; .Identification and other background verification data; .Monetary operation details; .Details of your activities in your website account; .Details of your activities in our Mobile App; .Details of your activities in our website; .Details of your existing bank account/-s; .Information related to legal requirements; .Contact details; .Communication details; .Other personal data needed (in order to evaluate the possibility of providing services).
11.To conduct research and development of our Website, Mobile App and Services to provide you and others with a better, more intuitive, and personalized experience	Legitimate interest.	.Information about your behaviour; .Communication details; .Details of your activities in your website account; .Details of your activities in our Mobile App; .Details of your activities in our website; .Contact details.
12.To provide an answer when you contact us via our website or other communication means	Your consent.	.Basic personal data; .Contact details; .Communication details; .Other personal data needed (in order to evaluate the

Purpose	Legal basis	Categories of personal data
		possibility of providing services).
13.To let you know about upcoming changes or improvements of Services, Website and/or Mobile App, provide other important information	Your consent.	.Basic personal data; .Contact details; .Communication details; .Other personal data needed (in order to evaluate the possibility of providing services).
14.To carry out direct marketing	Your consent.	.Basic personal data; .Contact details.

3.1. Processing of client verification data
3.1.1. For the Account to be created you must verify your identity. We verify you by the personal data you provide during registration. However, such personal data must be confirmed, therefore in addition, for verification purposes we also rely on verification services, managed, and provided to us by our service providers.
3.1.2. While exercising this verification step, you will be requested to upload your ID document. You will undergo facial verification. For the mentioned purposes we receive and rely on a certain confirmation from our service providers that your identity is verified. Please note, that under the applicable laws SaintPay is obligated to collect and store all data received during client identification and verification process therefore scanned copies of ID documents, data related to facial recognition and other information will be stored by SaintPay in accordance with this Privacy Policy and applicable legislation.
3.1.3. SaintPay may request to provide further information (i.e., information on participation in politics (through enhanced customer identification, a bank statement)) that will allow SaintPay to reasonably identify you and verify your identity. SaintPay reserves the right to contact you and request to provide more information or approve that provided information is up-to-date and valid.
3.1.4. SaintPay processes the above-mentioned personal data used for client's verification to comply with regulatory and legal obligations as well as to ensure that clients are not attempting to create additional Accounts or to commit fraudulent actions. If you do not feel comfortable with this identification method, you may contact us by e-mail at contact@saintpay.com for an alternative way to identify you.
3.1.5. Processing of your ID document, facial verification data, uploaded to a third-party database as described above, is covered by third parties' privacy policies. All personal data you provide for the verification process shall be provided directly by you to our service provider performing your verification and therefore processing of such data shall be covered by the

policies of such service provider. You should carefully review privacy policies of such service providers before starting the verification process.

3.2. Processing personal data of other individuals
3.2.1. In providing personal data of any individual other than yourself to us during the use of our Services, you agree that you have obtained consent and informed such individual about the disclosure of their personal data for collection and use and brought this Privacy Policy to their attention. By providing such personal data to us you bear all the responsibility towards such individuals if you have not received proper consents for such provision and you undertake to indemnify us for any liability which may appear due to unlawful provision and/or disclosure of personal data.

DEVELOPING THE WEBSITE AND MOBILE SERVICES

We use personal data to conduct research and development of our Website, Mobile App and Services to provide you and others with a better, more intuitive, and personalized experience, driving membership growth.

4.1. Client support
We use personal data to keep in touch with you to provide you with customer service, notify you on news and updates, and provide you with security notices or information.

4.2. Security and investigations
We use personal data for security, fraud prevention and investigations. We use your personal data (including your communications) if we think it is necessary for security purposes or to investigate possible fraud or other violations of our Terms of Services, this Privacy Policy, implementing the regulatory and legal obligations. We may ask you to provide any additional information which we think may influence the process of investigation or examination of your complaint / request.

4.3. Profiling
Profiling carried out by SaintPay involves processing of personal data by automated means for the purposes of legislation relating to risk management and continuous and periodic monitoring of transactions to prevent fraud. Such ongoing profiling is based on legitimate interests of SaintPay, the performance of a legal obligation and the execution of the agreement.

4.4. Providing information on similar products and services
4.4.1. When you sign up to SaintPay, we give you the opportunity to opt in to offers and promotions. If you choose to opt in, we then use your data to tailor offers to you, so they are more likely to interest you. You can opt out again at any time by going to the settings in your Mobile App or browser. You can adjust your preferences or tell us you do not want to hear from

us, at any time. We will not pass your details on to any outside organizations for their marketing purposes without your permission.
4.4.2. When we use social media for marketing, your information may be shared with social media platforms, who may use it to check if you also hold an account with them. If you do, we may ask the advertising partner or social-media provider to:
-use your information to send our adverts to you when we think you might like one of our new products;
-not send you our adverts, because you already used the service advertised;
-advertise to people with a similar profile to you (e.g., if one of our services might appeal to someone with interests like yours).
4.4.3. If you want us to stop sharing your personal information for marketing purposes, just let us know via the SaintPay Website or Mobile App, or by emailing us atlegal@saintpay.com. You can also manage your marketing preferences directly with the social media platforms you are signed up to.

4.5. Third Party Information We will combine this information with information we have collected about you and we will use this information to help us better understand your financial circumstances and behaviour so that we may make decisions about how we manage your Account and to decide about whether to agree to approve application on Account opening.

PERSONAL DATA RECEIVED FROM THIRD PARTIES

5.1. We collect and receive your personal data from yourself, as well as from the following sources:
-We work closely with third parties to help us deliver our Service to you. These third parties are business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, fraud prevention agencies, customer service providers and developers. Information we may collect about you from such parties can include credit search information, information which helps us to verify your identity or information relating to your payment transactions;
 We may receive your personal data from banks or other financial institutions in case the personal data is received while executing payment operations;
- We may receive your personal data from other legal sources, such as public registers, internet search engines, public sources such as social media.
5.2. If you are a beneficial owner, shareholder, representative or employee of our corporate client we are collecting your personal data to fulfil legal and regulatory obligations. Your personal data is provided to us by the representatives of the company where you hold a certain position. Personal data received under this clause is processed in accordance with the provisions of this Privacy policy and you have all the rights of the data subject listed herein in this Privacy Policy and in the applicable laws.

HOW WE SHARE PERSONAL DATA

6.1. To provide you with the Services and meet our legal and regulatory obligations, we use third parties' services, and such third parties use personal data in delivering their services to us. Therefore, we may share the information we collect about you with our service providers (Data processors) such as:
- Cloud storage/servers' providers. We use their service to store your data safely and securely;
 Card issuing institutions. For providing you with a card to use our Services;
 Identification and verification services providers - to verify your identity;
 Auditors, accountants, and lawyers - to complete financial, technical, and legal audits of our operations, we may need to share information about your Account as part of such an audit;
 Public authorities, institutions, organisations, courts and other third parties, but only upon request and only when required by applicable laws, or in cases and under procedures provided for by applicable laws; Other service providers with which we have concluded service provision agreements or when such sharing is mandatory according to applicable law.
6.2. International transfers
6.2.1. We only use the services of those data processors which ensure safeguards and use technical and organizational security measures equivalent to the ones required by GDPR.
6.2.2. The data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area (EEA).
6.2.3. Personal data may be processed outside of the EEA for us to fulfil our contractual obligations towards you to provide the Services. We will need to process your personal data for us, for example, to action a request made by you to execute an international payment, process your payment details, provide global anti-money laundering, and counter terrorist financing solutions and provide ongoing support services. We will take all steps to ensure that your data is treated securely and in accordance with this Privacy Policy.
6.2.4. Transfers of personal data outside the EEA can be done in a number of different ways, for example:
- the country to which we send the personal data, a territory or one or more specified sectors within that third country, or the international organization is approved by the European Commission as having an adequate level of protection;
- the recipient has signed or contains in its terms of service (service agreement) standard contractual clauses adopted by the European Commission;
- special permission has been obtained from a supervisory authority.
6.2.5. We may transfer personal data to a third country by taking other measures if it ensures appropriate safeguards as indicated in the GDPR or on the basis of derogations.

6.3. Our legal obligation to use or disclose personal data
As a regulated financial institution, we may need to share your personal data to state and public authorities. We will only do so when we are legally required to provide information or when we need to take legal action to defend our rights, as well as the cases, where we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, legal process or enforceable governmental

request, enforce applicable Terms of Services, including investigation of potential violations, detect, prevent or otherwise address fraud, security or technical issues.

6.4. Others
SaintPay may partner with other financial institutions, such as banking, credit, and financial services partners, including banking partners, banking intermediaries, credit companies and international payments services providers. With their help we can provide you Services and to meet legal and regulatory requirements we might be obligated to share your account details with such partners to the extent you transact or interact with customers of such partners.

YOUR RIGHTS

7.1. The right to be informed: this right enables you to be provided with clear, transparent and easily understandable information about how we use your personal data;

7.2. The right to request access to information we process about you: this right enables you to receive a copy of the personal data we hold about you;

7.3. The right to request to correct incorrect / inaccurate information about you: this right enables you to have any incomplete or inaccurate personal data we hold about you to be corrected. Please note that we may need to verify the accuracy of the new data you provide to us;

7.4. The right to request to transfer all or part of the personal data: this right enables you to ask us to provide you with your personal data in a structured, commonly used, machine-readable format, which you can then transfer to another appropriate data controller. Note that this right only applies to automated information which you initially provided for us to use and consented for its use or where we used the information to perform a contract with you;

7.5. The right to request erasure of personal data: this right enables you to ask us to delete or remove personal data where there is no good reason for us to process it, or if you have successfully exercised your right to object to processing (as described in clause 7.7. herein below). Please note that SaintPay, as a regulated financial institution is obligated under the applicable laws regarding prevention of money laundering and terrorist financing as well as of Law on Electronic Money and Electronic Money Institutions of the Republic of Italy to retain certain information you have provided for several years, as indicated in certain legislation, therefore we may not always be able to comply with your request of erasure for the mentioned reasons. We will notify you at the time of your request if the situation is as described;

7.6. The right to request restriction of data processing: this right enables you to ask us to suspend the processing of your personal data in the following cases: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; (d) you have objected to our use of your data but we

need to verify whether we have overriding legitimate grounds to use it. Please note that such requests may lead to a situation that we may not be able to perform our contractual obligations towards you or enter a contract with you. If this would be the case, we will notify you about it;

7.7. The right to object to processing of personal data when processing is carried out based on legitimate interest: this right can be exercised in a situation where we are relying on our legitimate interest (or those of a third party) but in your situation such processing impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. Please note that SaintPay, as a regulated financial institution is obligated under the applicable laws regarding prevention of money laundering and terrorist financing in the Republic of Italy to process your certain personal data for compliance purposes, therefore in some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights. Please note that requirements of the mentioned laws supersede any right to objection under applicable data protection laws. If you object to the processing of certain data, then we may not be able to provide you Services and it is likely we will have to terminate your account;

7.8. The right to withdraw permission: this right enables you to withdraw your consent at any time, if you have given us consent. It will have been lawful for us to use the personal data up to the point you withdrew your permission;

7.9. The rights related to automated decision-making: these rights enable you not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects. In particular, you have the right to obtain human intervention, to express point of view, to obtain an explanation of the decision reached after an assessment and to challenge such a decision.

7.10. To exercise any of the rights mentioned above, please reach out to our client support team via email contact@saintpay.com by filling out a request form on our Website. We may ask you to verify your identity and for more information regarding your request.

7.11. You may at any time edit, update, or delete your contact details contacting our service center via e-mail contact@saintpay.com.

HOW LONG DO WE KEEP YOUR DATA

8.1. We will keep your personal data for as long as it is needed for the purposes for which your data was collected and processed, including for the purposes to comply with any legal, regulatory, tax, accounting or reporting obligations. This means that we store your data for as long as it is necessary for provision of the Services and as required by the retention requirements in laws and regulations. If the legislation of the Republic of Italy does not provide any applicable data retention period, it shall be determined by us, taking into account the legitimate purpose of the data retention, the legal basis and the principles of lawful processing of

personal data.

8.2. SaintPay, as a regulated financial institution is obligated under the applicable laws regarding prevention of money laundering and terrorist financing to retain your personal data for the following periods:

- Client identification data and verification data - eight years after termination of the contract relations in accordance with the Law of the Republic of Italy on the Prevention of Money Laundering and Terrorist Financing;
- History of transactions - five years after terminations of the contract relations in accordance with the Law of the Republic of Italy;
- in case your application is rejected, your personal data shall be stored for a period of 3 months, except when such data was collected for the implementation of the obligations under the applicable anti money laundering laws in the Republic of Italy.

8.3. We therefore use this retention requirement as a benchmark for all personal data that we receive from you. To not hold your information for longer than is strictly necessary we will not hold any of your personal data for more than 8 years after the termination of our business relationship.

8.4. Other personal data retention periods are as follows:
-as long as your consent remains in force, if there are no other legal requirements which shall be fulfilled with regard to the personal data processing;
-the personal data submitted by you through our Website, Mobile App or via e-mail is kept for an extent necessary for the fulfilment of your request and to maintain further cooperation, but no longer than 6 months after the last day of the communication, if there are no legal requirements to keep them longer.

COMPLAINTS

9.1. You have the right to lodge a complaint to the national Data Protection Agency (DPA) in the country of residence in the event where your rights may have been infringed. We would, however, appreciate the chance to deal with your concerns before you approach the DPA and find a solution at your satisfaction. So please contact us in the first instance.
9.2. If you are a resident of the Republic of Italy, you can contact the Garante Per La Prtezione Dei Dati Personali (i.e. the Italian Data Protection Authority) if you believe that the personal data is processed in a way that violates your rights and legitimate interests stipulated by applicable legislation. You may apply in accordance with the procedures for handling complaints that are established by the Garante Per La Prtezione Dei Dati Personali and which may be found by this link: https://www.garanteprivacy.it/web/garante-privacy-en
9.3. Please be noticed that SaintPay identifies you by personal data and e-mail, which you have provided to us when you signed up for the Services. When you submit your request, always provide your personal details and send your request via email you have submitted when you

signed up for the Services. In other cases, we will not be able to identify you properly and submit the information requested by you or to fulfil your request.

DATA PROTECTION OFFICER (DPO)

10.1. Contact email:legal@saintpay.comwho is responsible for matters relating to privacy and data protection.
10.2. If you have any further questions regarding the personal data SaintPay collects, or how we use it, then please feel free to contact us at the details as indicated above hereof.