

We in our company respect and protect Your privacy. This Privacy notice describes our relations regarding Your personal data.

## **I. Introduction**

Our company Pellopay Finance LTD is the Controller who determines the purpose and means of processing of Your personal data.

Here is our contact information:

Pellopay Finance LTD

Registration number: BC1421568

Address: 422 Richards St, suite 170 Vancouver BC V6B 2Z4 Canada.

If You have any questions regarding processing of Your personal data by us, feel free to contact our personal data protection officer via the following e-mail: [pellopay26@gmail.com](mailto:pellopay26@gmail.com)

## **II. Purpose and legal basis for processing.**

We shall never process Your personal data unlawfully. Thus, all Your personal data are processed on the following legal basis:

1. Performance of the contract, which both You and we enter into when You chose to use our services;
2. Compliance with our legal obligations including accounting rules and regulations related to combating money laundering, terrorism financing, proliferation, fraud and other financial and non-financial crimes;
3. Protecting of our legitimate interests should there be any dispute regarding provision of our services to You. This includes protecting of our civil, commercial and procedural rights during related processes, disputes and litigations.

Since You visit our website and we hope that You are interested in using our services, our main and only purpose of processing of Your personal data is ensuring of provisioning our services to You.

Please, be informed, that a failure to provide Your personal data to us for the mentioned purposes makes it technically and legally impossible to provide our services to You as we shall not be able to fulfill our contractual obligations to You and our legal obligations in respect of Law and order (such as combating money laundering, terrorism financing, proliferation, fraud and other financial and non-financial crimes).

## **III. Processed personal data and methods of processing.**

We shall process the following personal data of Yours:

- Your name / family name
- Your country of residence
- Your unique personal identification number (if You have one)
- Your date of birth
- Your nationality (citizenship)
- Your phone number
- Your e-mail address
- Your residence address
- Copy of Your ID document with the number, date of issuance, country of issuance and expiry date
- Dates of Your transactions
- Sums of Your transactions
- Your IP address
- A picture and video recording of Your face
- Data on Your income (sums, source)

The following methods of processing of Your personal data will be used by us:

- Collecting
- Storing
- Transferring
- Amendingничего
- Erasing

#### **IV. Recipients of Your personal data.**

Please, be informed, that for rendering our services in an appropriate way or for fulfillment of our legal obligations we'll have to transfer Your personal data to the following recipients:

<b>Personal data recipient</b>	<b>Type of data transferred</b>
Your payment card issuer	Name / family name
	Sum of transaction
	Date of transaction
Acquiring financial institution	Your name / family name
	Your country of residence
	Your unique personal identification number (if You have one)
	Your date of birth
	Your nationality (citizenship)
	Your phone number
	Your e-mail address
	Your residence address
	Copy of Your ID document with the number, date of issuance, country of issuance and expiry date

	Dates of Your transactions
	Sums of Your transactions
	Your IP address
	Your picture and video recording of Your face
	Data on Your income (sums, source)
Recipient of Your payment:	Your name / family name
	Date of Your transaction
	Sum of Your transaction
	Purpose of payment
State authorities when prescribed by legal regulations: <ul style="list-style-type: none"> <li>- Financial regulators;</li> <li>- Financial investigation or intelligence services;</li> <li>- Police;</li> <li>- Courts.</li> </ul>	Your name / family name
	Your country of residence
	Your unique personal identification number (if You have one)
	Your date of birth
	Your nationality (citizenship)
	Your phone number
	Your e-mail address
	Your residence address
	Copy of Your ID document with the number, date of issuance, country of issuance and expiry date
	Dates of Your transactions
	Sums of Your transactions
	Your IP address
	Your picture and video recording of Your face
	Data on Your income (sums, source)
Our third party identification and verification services provider	Name / family name
	country of residence
	date of birth
	residence address
	Copy of Your ID document with the number, date of issuance, country of issuance and expiry date
	Your IP address
	Picture and video record of Your face

## V. Transfer to other countries.

Please be informed that Your personal data shall be transferred to other countries, but You do not have to be worried about that, as we thoroughly check all recipients of Your personal data outside Canada and we ensure, that both us and such a recipient undertake all necessary measures to keep Your personal data safe and secure.

## VI. Term of storing.

Please be informed, that Your personal data are to be stored by us for at least 5 (five) years after termination of our relations. The said term is prescribed to us by regulations related to combatting money laundering / terrorism financing / proliferation / fraud and applicable accounting laws. The said regulations and laws may, from time to time, require personal data storing for a longer period and we shall have to comply with that.

## VII. Your rights regarding Your personal data.

When it comes to processing of Your personal data You have the following rights.

<b>Your rights</b>	<b>What it means</b>
Right of access	If you ask, we'll provide a copy of Your personal data we process.
Right to rectification	If You think Your personal data processed by us are incomplete or incorrect, You are entitled to rectification of such an incompleteness or incorrectness. But in this case, we shall need sufficient evidence from You to justify the requested corrections.
Right to erasure ('right to be forgotten')	<p>You can ask us to delete your personal data if:</p> <ul style="list-style-type: none"><li>- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</li><li>- You object to processing of Your personal data and there are no overriding legitimate grounds for the processing;</li><li>- Your personal data have been processed unlawfully;</li><li>- the personal data have to be erased for compliance with a legal obligation in law to which we are the subject.</li></ul> <p>Please be informed that we are subject to strict regulations regarding combatting money laundering / terrorism financing / proliferation / fraud, thus we are</p>

	obliged to keep Your personal data and transaction data and we may be forbidden from erasing any of Your personal data even if You request to do so.
Right to portability	In case of necessity, You are entitled to request and we, subject to any legal restrictions, shall provide You with Your personal data provided to us by You in a portable, structured, commonly used, machine-readable format.

Any Your requests regarding Your personal data processed by us should be send to us via the e-mail: [pellopay26@gmail.com](mailto:pellopay26@gmail.com)

Any Your request shall be managed as quickly as possible, but not longer than in 30 (thirty) days. In case of necessity, we can extend this term for another 30 (thirty) days.

### **VIII. Right to lodge a complaint.**

If You feel Your privacy rights are infringed by our processing of Your personal data, You are entitled to lodge a complaint to a personal data authority of Your country.

If You are from the European Union here is a link where You can find contact details of Your personal data protection authority: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en).

If You are from Canada, here is the link to the Office of the Privacy Commissioner of Canada: <https://www.priv.gc.ca/en>.

A large list of data protection authorities all around the world can be found here as well: [https://en.wikipedia.org/wiki/National\\_data\\_protection\\_authority](https://en.wikipedia.org/wiki/National_data_protection_authority).

### **IX. Protection of Your personal data.**

We understand the importance of protection of personal data. Thus, any Your personal data processed by us shall be handled with the utmost care and security.

We use a fusion of physical and technical measures to:

- keep your personal data secure and invincible
- prevent unauthorized access to your personal data;
- prevent unauthorized actions (alteration, erasing) of Your personal data;
- make sure your personal data is not used in an improper way or disclosed to improper recipients.

Your personal data is stored on secure computer systems with access restricted by both physical and electronic means. Unauthorized personnel have no physical admission to premises where terminals with access to Your personal data are located. All electronic devices with access to Your personal data are protected against unauthorized access with passwords.

All our employees dealing with Your personal data receive due training in data protection and security.

We have elaborated policies and procedures for dealing with personal data, all our members of staff duly follow these procedures.

Although we take all reasonable steps to ensure that Your personal data is kept invincible to unauthorized access, we cannot guarantee it is secure during transmission by You to our website as we are not responsible and we do not have a control over Your used device. We use HTTPS (HTTP Secure), where the communication protocol is encrypted through Transport Layer Security for secure communication over networks, for our website.