

## **FINTCO PRIVACY POLICY**

This Privacy Policy governs your use of products, services, content, features, or technologies offered by **FINTCO** and all related sites, applications, and services (collectively “**FINTCO Services**”) including, without limitation, when you provide any information to us in relation to your use of **FINTCO** Services.

You accept and consent to this Privacy Policy when you sign up for, access, or use the **FINTCO** Services. By accepting and consenting to this Privacy Policy, you expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy.

### **1.- PERSONAL DATA COLLECTED**

Personal data is data that can be used to identify you directly or indirectly. Our privacy policy covers all personal data that you voluntarily submit to us and that we obtain from our partners. This privacy policy does not apply to anonymised data as this cannot be used to identify you. We may collect the following types of information:

- **Personal Identification Information:** Full name, date of birth, age, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.
- **Formal Identification Information:** Tax/ other ID number, passport number, driver’s license details, national identity card details, photograph identification cards, and/or visa information.
- **Financial Information:** Bank account information, payment card primary account number (PAN), transaction history, trading data, and/or tax identification.
- **Transaction Information:** Information about the transactions you make on our services, such as the name of the recipient, your name, the amount, and/or timestamp.
- **Employment Information:** Office location, job title, and/or description of role.
- **Online Identifiers:** Geo location/tracking details, browser fingerprint, OS, browser name and version, and/or personal IP addresses.
- **Usage Data:** Survey responses, information provided to our support team, public social networking posts, authentication data, security questions, user ID, click-stream data and other data collected via cookies and similar technologies.

### **2.- HOW WE USE THE INFORMATION WE COLLECT**

**Internal Uses:** We collect, store and process your information on servers located in the world. Our primary purpose for collecting your information is to provide you with a safe, smooth, efficient, and customized experience. You agree that we may use your personal information to:

- Process transactions and provide to FINTCO;
- Verify your identity, including during account creation and password reset processes;
- Resolve disputes, collect fees, and troubleshoot problems;
- Manage risks, or to detect, prevent, and/or remediate fraud or other potentially illegal or prohibited activities;
- Detect, prevent or remediate violations of policies or applicable user agreements;

- Provide you with customer support services;
- Improve FINTCO by customizing your user experience;
- Measure the performance of FINTCO and improve their content and layout;
- Manage and protect our information technology infrastructure;
- Provide targeted marketing and advertising, provide service updates, and deliver promotional offers based on the communication preferences you have defined for your FINTCO account (please refer to the section "Our Contact with FINTCO Customers" below) and your activities when using to FINTCO; and
- Perform creditworthiness and solvency checks, compare information for accuracy, and verify it with third parties.
- Questionnaires, Sweepstakes, Surveys and Profile Data: If you choose to answer our optional questionnaires or surveys, we may use such information to improve FINTCO, send you marketing or advertising information, manage the sweepstakes, or as otherwise explained in detail in the survey itself.

### **3.- PERSONAL DATA FROM THIRD PARTY PROVIDERS**

Controller primarily collects personal data about you from you. From time to time, we may, however, also collect data about you from third party sources, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms. We obtain information about you from public databases and ID verification partners for purposes of verifying your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data.

### **4.- COLLECTION AND USE OF INFORMATION COLLECTED AUTOMATICALLY**

We may receive and store certain types of information automatically, such as whenever you interact with our website. This information does not necessarily reveal your identity directly but may include information about the specific device you are using, such as the hardware model, device ID, operating sysem version, webbrowser software (*such as Firefox, Safari, or Internet Explorer*) and your Internet Protocol (IP) address/MAC address/device identifier.

For example, we may automatically receive and record information on our server logs from your browser, including your IP address; device type and unique device identification numbers, device event information (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL), broad geographic location (e.g. country or city-level location) and other technical data collected through cookies, pixel tags and other similar technologies that uniquely identify your browser. We may also collect information about how your device has interacted with our website, including pages accessed and links clicked.

We may use identifiers to recognise you when you arrive at the Site via an external link, such as a link appearing on a third party site.

#### **5.- INFORMATION SECURITY**

**FINTCO** is committed to handling your customer information with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorize access to personal information only for those employees who require it to fulfil their job responsibilities, and who have committed themselves to confidentiality undertakings.

The security of your **FINTCO** account also relies on your protection of your **FINTCO** password. You may not share your **FINTCO** password with anyone. **FINTCO** representatives will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorized and suspicious and forwarded to us. If you do share your **FINTCO** password with a third party for any reason, including because the third party has promised to provide you additional services such as account aggregation, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also contact us right away.

#### **6.- CONTACT AND NEWSLETTERS**

If you have given your consent, Controller may contact you via the address, e-mail and / or phone number you provide on your account for marketing, surveys, news and/or similar initiatives.

#### **7.- ENCRYPTION OF DATA TRAFFIC**

Controller is committed to handling your Customer Information with the highest standards of information security. When your information is transferred over the internet, SSL encryption is used to ensure your sensitive data is not accessible to anyone on the internet. The data that is communicated back and forth between Controller and your computer is encrypted with a 256-bit SSL certificate. This means no one can intercept the data stream between Controller and your device.