

UAB „Bonum Payments”

# **PRIVACY AND PERSONAL DATA PROCESSING NOTICE**

Last updated: 30.10.2023

## Introduction

This Privacy and Personal Data Processing Policy (**'Policy'**) of Bonum24, informs and explains how Bonum24 processes the Personal Data of the Users of the Website and the Services of Bonum24. This Policy should be read in conjunction with the [Terms of Service](#) and [Cookies Policy](#) of Bonum24. All of the definitions used in and all circumstances not covered by this Policy shall be regulated by the Terms of Bonum24 and/or Regulation (EU) 2016/679 (GDPR).

While using the Website and/or the Services You agree for the Personal Data Processing in accordance with the Policy and affirm that. In a case You do not agree with the Policy partially or fully, You must stop using the Services. Bonum24 encourages You to read this Policy carefully as it forms a relevant part of the Agreement between You and Bonum24.

## Definitions

**'Data Controller'** means the person who determines the purposes for which and the manner in which any personal information is, or is to be, processed. For the purpose of this Policy, Bonum24 is the Data Controller of Your Personal Data

**'Personal Data'** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**'Processing'** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## Personal data Bonum24 collects

Bonum24 collects certain Personal Data about You and Your use of the Website and the Services. This information falls into three primary categories:

1. information You provide to Us;
2. information We collect from You automatically; and
3. information We collect from third parties.

### Information You provide to Us

This information is either required by law necessary for Us to provide You with the requested Services or are relevant for Our legitimate interests. The nature of the Services You are requesting will determine the kind of Personal Data We might ask for, but may include:

**Identification data:** information for conducting KYC and KYT processes, such as Your full name, date of birth, address, contact details, photo of an ID document, proof of address document proof of legal formation and/or any other information deemed necessary to comply with Our

legal obligations under the applicable anti-money laundering, sanctions and other relevant statutory requirements.

**Financial data:** including Cryptocurrency wallet addresses information, bank account information.

**Transactions data:** information about the transactions You make using the Services, such as the name of the Cryptocurrency, the amount, and/or timestamp.

**Correspondence data:** including, survey responses, information provided to Our Customer Support team or other team members.

### **Information We collect from You automatically**

This information is collected automatically by the virtue of You accessing and/or using the Website and/or the Services and helps Us to improve the Website and the Services, address any customer support issues, provide You with a streamlined and personalized experience, and protect You from fraud by detecting unauthorized access. This information may include:

**Identifiers:** geo location/tracking details, operating system, browser type, and/or personal IP addresses.

**Usage data:** information about how You use the Website and/or the Services, such as Your web request, pages viewed, authentication data and other data collected via cookies and similar technologies. Please read Our [Cookies Policy](#) for more information.

### **Information We collect from third parties**

This includes information We may obtain about You from third party sources. We work closely with third parties in order to help Us deliver the Services 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 information which helps Us to verify Your identity or information relating to Your transactions.

## **Purposes and legal bases for Personal Data Processing**

We rely on legal bases for Processing Personal Data under the relevant data protection legislation. This means We will only Process Personal Data where We are legally required to; where Processing is necessary to perform any contract we entered with You or to take steps at Your request prior to entering into a contract with You; where Processing is in Our legitimate interests to operate Our business and not overridden by Your data protection interests or fundamental rights and freedoms; or where We have obtained Your consent to do so.

Bonum24 Processes Personal Data for the following purposes:

**Compliance with legal obligations:** Bonum24 needs to Process Personal Data in order to comply with relevant applicable laws, such as, anti-money laundering and privacy laws. For example, We Process Personal Data to identify and verify Users using the Services to manage risk as required

under applicable law. We also Process Personal Data in order to help detect, prevent, and mitigate fraud and abuse of the Services and to protect You against account compromise or funds loss. If you do not provide Personal Data required by law, We cannot provide You the Services.

**To provide the Services:** Bonum24 Processes Personal Data to provide the Services. As Bonum24 handles sensitive data, such as Your identification and financial data, it is very important to actively monitor, investigate, prevent, and mitigate any potentially prohibited or illegal activities, enforce Our agreements with third parties, and/or prevent and detect violations of our [Terms of Service](#). We collect information about Your usage of and closely monitor Your interactions with the Services. Third parties that We use such as for identity verification services, fraud prevention services and/or payment services may also access and/or collect Personal Data when providing the services. The consequences of not Processing Personal Data for such purposes is the termination of Your Account.

**To provide communications and support services:** According to Your preferences and in compliance with applicable law, We may send You marketing communications (e.g. Our newsletters) that We believe may be of interest to You. We only Process Personal Data for this purpose with Your consent.

We may send administrative, account and/or transaction related communications to You to keep You updated about the Services, inform You of relevant security issues, or provide other information related to your transactions. You cannot opt-out of receiving critical service communications.

We also Process Personal Data when You contact Us to investigate and settle any questions and disputes, collect fees, or to troubleshoot problems. Without Processing Personal Data for such purposes, We cannot respond to Your requests and ensure Your uninterrupted use of the Services.

**Our legitimate business interests:** Sometimes the Processing of Personal Data is necessary for Our legitimate business interests, such as:

- quality control and staff training;
- to enhance security, monitor and verify identity or service access, and to combat spam or other malware or security risks;
- research and development of the Services;
- to personalize Your experience; or
- to facilitate corporate acquisitions, mergers, and transactions.

Personal Data provided by You when applying for a position with Bonum24 may be processed in connection with and as required for our recruiting and applicant tracking process.

## Disclosing Personal Data

Bonum24 will not rent or sell Your Personal Data to anyone.

Bonum24 only shares the Personal Data when Bonum24 has a valid reason for it, namely, to provide the Services to You and when Bonum24 is legally permitted to do so.

Bonum24 may share Personal Data between and among **subsidiaries and affiliated companies of Bonum24** for purposes of KYC and KYT processes, fraud detections, decision making, customer support, and other business purposes.

Bonum24 may disclose Personal Data to **third parties that Bonum24 uses to provide the Services**. These parties have been rigorously assessed and offer a guarantee of compliance with the applicable legislation on the Processing of Personal Data. Such third parties may include providers of support services such as secure website hosting, cloud storage, information technology maintenance, network infrastructure, payment processing, security, fraud detections, elements of KYC and KYT processes, customer support and analytics.

Bonum24 may be required to share Personal Data with various **financial institutions and/or enforcement or court authorities** to comply with applicable laws, prevent fraud, enforce an agreement We have with You, or to protect Our rights, property or safety, or the rights, property or safety of Our employees or others.

Bonum24 may also disclose Personal Data to third parties:

- if You request or authorize it;
- to address emergencies or acts of God;
- in the process of provision of banking, legal, compliance, and other consulting services by professional advisors in order to complete required legal audits of our operations, or otherwise comply with Our legal obligations;
- as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties (acquirer, successor, or assignee) as one of Our business assets to. In such case, Bonum24 makes sure that Your rights and conditions as a data subject shall not be decreased;
- to protect Our legal rights;
- to address disputes, claims, or to persons demonstrating legal authority to act on Your behalf.

## Your rights

In accordance with relevant legal acts, You have all the rights of a data subject as regards to own Personal Data. Such rights include the following:

- request an access to Your own Personal Data;
- request to receive Personal Data We hold about You;
- request changes or corrections in Your own Personal Data;
- request erasure of Your own Personal Data;

- request that we restrict Our processing of Your own Personal Data;
- withdraw consent to the Processing of Personal Data collected on the basis of Your consent;
- request the transmission of Personal Data directly to another data controller (portability);
- submit objections to Your own Personal Data processing on any grounds.

If you would like to exercise Your rights, please contact Us using the contact details listed below.

We may limit these privacy rights requests:

- when denial of access is required or authorized by law;
- when granting access would have a negative impact on another's privacy;
- to protect Our rights and properties;
- where the request is frivolous or burdensome.

You do not need to pay a fee to access information or other rights, but Bonum24 may charge a reasonable fee if Your request is clearly unfounded, repetitive, or excessive or refuse to comply with Your request in these circumstances.

In case of Your rights violation, You have the right to ask State Data Protection Inspectorate or court to protect Your rights.

## Personal Data retention

The retention of Personal Data is subject to the following criteria:

- **Business Purpose:** We will retain Personal Data for as long as necessary to fulfill the purposes for which it was collected; and
- **Legal Obligations:** Applicable laws and regulations may mandate a minimum retention period for Personal Data.

Bonum24 collects and retains documents and data about the User and their transactions and other activities during and after the Know Your Customer (KYC) verification process, in the course of monitoring the business relationship (also incl. any instances, where Bonum24 was not able to implement customer due diligence and circumstances of the termination of a business relationship). These shall be retained for a period of 8 years following the expiration of the business relationship or the completion of the transaction. Bonum24 also retains data related to its reporting obligation and the correspondence associated with the business relationship with the User:

- **Data related to reporting obligation:** Data associated with the performance of reporting obligations will be retained for a period of 8 years following the completion of the reporting obligation.
- **Correspondence of business relationship:** Correspondence related to the business relationship with the User shall be retained for 8 years from the date of the termination of the business relationship.

For more information on Personal Data retention please contact Us using the contact details listed below.

### Personal Data disposal

We will cease to retain Personal Data or remove the means by which the data can be associated with You as soon as it is reasonable to assume that such retention no longer serves the purpose for which the Personal Data was collected. Data will be disposed of when it is no longer necessary for legal or legitimate business purposes.

The disposal process will be conducted in a manner that ensures the secure and irreversible deletion of Personal Data. This includes the removal of data from all storage systems and databases, and the destruction of physical records, where applicable. The disposal process will comply with applicable data protection regulations and guidelines.

For any further inquiries regarding Personal Data retention or disposal, please do not hesitate to contact Us using the contact information provided below.

### Security and international transfers

Although generally the Personal Data is processed within the European Economic Area, certain activities may result in the transferring of Personal Data to third countries, meaning countries located outside the EEA. When We do transfer personal data outside the EEA, We will take steps to ensure that Your Personal Data is protected at the same level as within the EEA by adequate safeguards. For example, by contracts containing standard data protection clauses which are in a form approved by the European Commission and/or a contract with the recipient ensuring that they will Process the data with the same level of data protection as within the EEA.

Bonum24 takes all necessary measures to protect the data against unauthorized access, modification, disclosure or destruction. Bonum24 has implemented various technical and organizational measures to be compliant with applicable Personal Data, privacy, and data security legislation in the countries where Bonum24 operates or where the applicable law applies to Bonum24.

If you have reason to believe that Your Personal Data is no longer secure, please contact Us immediately using the contact details listed below.

### Third-party links

The Website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about You. Bonum24 does not control these third-party websites and is not responsible for their privacy policies. Bonum24 strongly encourages You to read the privacy policy of every website You visit, particularly when leaving the Website.

## Policy changing

The Policy can be changed to comply with changes in law, Personal Data processing or under instructions of supervisory authorities. Bonum24 will make available the updated Policy on the Website.

## Contact details and questions

In case of any questions about this Policy, processing of Personal Data or data subject's requests please contact Bonum24 via email at [info@bonum24.eu](mailto:info@bonum24.eu).