

## **Privacy Policy:**

Overview:

This privacy policy (this "Policy") explains how Personal Information is collected, used, and disclosed by Starpay Global Ltd, trading as Starpay (collectively, " Starpay," " we," " our" or " us"). This Policy applies to users ("you") of Starpay's services, websites, applications, and machines (each, a " Service," and collectively, our " Services").

### **A. INFORMATION WE COLLECT**

Personal Information. By using our Services, we may collect the following categories of personal information ("personal information") of the person(s) who are company director(s), beneficial owner(s), or authorised person(s) of the merchant that we provide Services to:

- Name
- Date of birth
- Place of birth and nationality
- Identification documentation, such as copy of the passport, National Identity card or such other documentation as is required by local law, copies of these documents may include a photograph of your face
- Home address, email address and other contact details

We may ask for additional information such as, but not limited to, financial standing, employment details and experience to support merchant account application. We will also use our own records and information from other sources where applicable.

We process your Personal Information to meet our legal, statutory and contractual obligations and to provide you with our Services. We will never collect any unnecessary Personal Information from you and do not process your information in any way, other than as specified in this Policy.

Under certain circumstances, it may be necessary for you to provide us with your Personal Information, for example, to enable us to provide Services to you or to comply with our legal obligations. In other circumstances, it will be at your discretion whether you provide us with Personal Information or not. However, failure to supply any of the Personal Information we request may mean that we are unable to maintain or provide Services to you.

We make every effort to maintain the accuracy and completeness of your Personal Information which we store and to ensure all of your Personal Information is up to date. However, you can assist us with this by promptly contacting us if there are any changes to your Personal Information. We shall not be responsible for any losses you suffer arising from any inaccurate, inauthentic, deficient or incomplete Personal Information that you provide to us.

### **B. HOW WE USE YOUR INFORMATION**

We only process your Personal Information where:

- a. the processing is necessary to comply with our legal obligations including:

- to carry out money laundering, financial and credit checks and for fraud and crime prevention and detection purposes;

- to comply with our legal and regulatory obligations; and

- to comply with court orders and exercise and/or defend our legal rights, as otherwise permitted or required by any applicable law or regulation; or

b. the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into such contract; or

c. the processing is necessary for our legitimate interests or the legitimate interests of others (except where such interests are overridden by the interests or rights of your employees, agents and contractors and those of your associated entities requiring the protection of their Personal Information) including:

- for monitoring and assessing compliance with Starpay's policies and standards; - for promotional and marketing materials and activities;

- to comply with court orders and exercise and/or defend our legal rights, as otherwise permitted or required by any applicable law or regulation;

- to identify person(s) authorised to act on behalf of our clients;

- for administrative purposes in relation to the security and access of our systems, offices, platforms and secure websites and applications; and

- to contact you about the Services we offer

Our Role as Data Controller and Data Processor.

We generally act as the data controller of your Personal Information. Starpay do not and will not share, disclose or trade your Personal Information collected from above processes. Under certain payment scheme, payment companies may engage us to provide them with certain processing services related to information owned or controlled by the payment companies. We are not responsible for any payment companies' use of information for which it is an owner or controller.

### C. SECURITY OF YOUR INFORMATION

Starpay takes commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss,

misuse, unauthorised access, disclosure, alteration, and destruction.

When your merchant transaction is being transmitted to our Services or through our Services, it will be protected by cryptographic protocols. To be clear, Starpay does not itself store any Personal Information of yours or your clients' through transactions.

We assume no liability or responsibility for disclosure of any personal information due to errors in transmission, unauthorised third-party access, or other causes beyond our control.

You play an important role in keeping your information secure. You should not share your user name, password, or other security information for your Starpay account with anyone. If we receive instructions using your user name and password, we will consider that you have authorised the instructions. If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), please contact us immediately as detailed in the Contact Us section, below.

#### D. ACCESS, CORRECTION AND DELETION OF YOUR INFORMATION

If you wish to update, modify/correct, delete or, access your Personal Information, receive a copy of the personal data collected from you, or if you would like us to stop processing any of your Personal Information, to the extent you are entitled to do so under applicable law, you can make such a request by writing to us detailed in the Contact Us section, below. We will respond to your request within the time prescribed by applicable law. If such changes are made pursuant to your request(s) this may affect our ability to continue to provide our Services to you and under such circumstances, we reserve the right to terminate our Services to you.

In any of the situations listed above, in order for us to comply with our security obligations and to prevent unauthorised disclosure of data, we may request that you provide us with a copy of a valid means of identification and verification of the identity of the individual whose Personal Information is the subject of such a request.

#### E. INTERNATIONAL TRANSFERS

Information about you may be transferred to, or accessed by, entities located around the world as described in this Policy. Some of these entities may be located in countries that do not provide an equivalent level of protection as your home country. Where required, Starpay will ensure that we have adequate safeguards in place so that your Personal Information is treated securely and in accordance with applicable law and regulation and with our policies and standards. By using our Services, and providing us information about you, you consent to the international transfer of information about you to the above parties.

The most common reason for us disclosing information overseas is because we use service providers to perform some functions on our behalf, and some of these service providers are lo-

cated outside the European Economic Area (EEA). We only disclose information to these organisations when it is necessary for the services they provide to us. For the most part, these service providers are entities related to us which perform a range of technology and operational functions for us.

#### F. CONTACT US

If you have any questions about this Policy or information we have collected about you, please contact us by email at [data@starpayglobal.co.uk](mailto:data@starpayglobal.co.uk).