#### **WEXOPAY PRIVACY POLICY**

Your privacy is a priority for us. We see its protection as part of our social responsibility. We would therefore like to provide you with information about how we process your personal data when providing the Services.

## 1. Basic provisions

1.1 The controller of personal data pursuant to Article 4, point 7 of the GDPR (Regulation (EU) 2016/679) is the company:

Wexo Solution, Company ID: 56577923, with its registered office at Nevädzová 5, 821 01 Bratislava, Slovak Republic, registered in the Commercial Register kept by the District Court Bratislava III, section: Sro, file number: 182478/B (hereinafter referred to as the "Operator").

Contact details of the Operator:

Address: Nevädzová 5, 821 01 Bratislava, Slovak Republic Email: hello@wexopay.com

- 1.2 Personal data is 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, email address, cryptocurrency wallet details, payment account details, 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 person.
- 1.3 The operator undertakes to use, collect and process personal data in such a way that the data subjects do not suffer any harm to their rights, and will ensure protection against unauthorized interference with the private life of the data subjects.
- 1.4 The operator does not have a designated Data Protection Officer (DPO).

# 2. Source and categories of data processed

- 2.1 The operator processes personal data that you provide directly, for example when registering, using the application, or contacting customer support.
- 2.2 We also process data obtained as part of the provision of services, in particular: name, surname, email, address, telephone number, identification data from identity documents, cryptocurrency wallet data, payment data, IP address, login time, device used, browser settings and data related to account security.

## 3. Purpose and legal basis for processing personal data

3.1 We process personal data for the following purposes:

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- (i) provision of services and performance of the contract,
- (ii) fulfillment of legal obligations, especially in the area of AML/CFT,
- (iii) the legitimate interest of the Operator (e.g. marketing, system security),
- (iv) based on the user's explicit consent for example, when subscribing to newsletters.

## 4. Recipients of personal data

- 4.1 Your personal data may be made available to trusted partners and intermediaries with whom the Operator has concluded data processing contracts. These may be providers of IT services, analytical tools, cloud platforms, verification services (e.g. Entrust), or partners such as Wexo Europe sro. and other entities involved in the provision of services, including, but not limited to:
  - mailing services (SendGrid service from Twilio Inc., 375 Beale Street, Suite 300, San Francisco, CA 94105, USA);
  - securing related services (Wexo Europe s.r.o., ID: 026 54 962, with registered office at Na Strži 1702/65, Nusle, 140 00 Prague 4, Czech Republic);
  - providing identification services in digital form (Entrust LTD, 3 Finsbury Avenue, London, England, company number: 07479524)
- 4.2 In the event of data transfer outside the EU/EEA, we will ensure that an adequate level of protection is ensured in accordance with Articles 44 et seq. of the GDPR.

## 5. Personal data retention period

5.1 We store personal data for the period necessary to fulfill the purposes for which they were obtained, but no longer than 10 years from the termination of the contractual relationship, unless otherwise provided by law or if there is no legitimate interest in their further storage.

## 6. Rights of the data subject

6.1 The data subject has the right to access personal data, rectify or delete them, the right to restrict processing, the right to data portability, the right to object to processing, as well as the right to file a complaint with the supervisory authority - the Office for Personal Data Protection of the Slovak Republic.

## 7. Personal data security

7.1 The operator has taken appropriate technical and organizational measures to secure personal data, while continuously evaluating and updating the security procedures set.

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#### 8. Use of cookies

8.1 The website uses cookies to ensure functionality, personalize content and analyze traffic. The user has the option to adjust their settings within the browser or directly on the site in accordance with applicable regulations.

## 9. Final provisions

- 9.1 By using our services, you agree to these policies. The operator reserves the right to modify these policies at any time. The current version is always available on the website.
- 9.2 This Privacy Policy shall enter into force on 01.09.2023. This document is prepared in Slovak, Czech and English. In case of any discrepancy, the Slovak version shall prevail.
- 9.3 In the event of any conflict between the language versions of these policies, the Slovak version shall prevail. All other language versions are for informational purposes only.

These principles come into effect on 01.05.2025.

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