
Effective as of 25.05.2018

This Data protection and Privacy policy describes how we collect, use, process and disclose your information, including personal information, in connection with access and use of the Em@ney plc systems.

When this policy mentions "us" or "our", it refers to the respective companies, demonstrating Em@ney plc to the Client, pursuant to the above-mentioned Legal Agreements, which is responsible for your information under this Data Protection and Confidentiality (i.e. the "Data Controller").

The following document refers to products, services, contents, features, technologies or functions and to all related websites, applications and services offered by us, through which we provide payment- and electronic money services.

The company recognizes the utmost importance to the protection of our customers' personal data. In the following provisions on data protection and privacy, we inform the customer about the collection, use and processing of personal data of the user when he applies, register and/or use all the features included in the service, including our website, (www.emworl.eu), account of electronic money and cards.

In order to provide online access to payment instruments, electronic money accounts and cards under the General Terms and Conditions of Business with Em@ney plc, the data controller is Em@ney plc, registration number C5558 and located in 4/45 Regent House, Bisazza Street SLM 1640, Sliema, Malta.

In the event that one of the above entities is specified as Data Controller, we inform the user that the other entities specified above act as Data Processors of the Data Controller and vice-versa.

The final responsibility lies with the respective Data Controller and the user must address all questions relating to the respective controller with the contact details specified below.

Em@ney (Our) services may be used for personal and business purposes both by individuals or entities. If their activation is requested on behalf of an entity, the latter will be considered as the authorized person and you may be required to disclose personal data of legal representatives, employees, agents, ultimate beneficial owners or any other third party, related to the entity in accordance with the rules described below.

The user certifies that, where he has provided information related to any third party, he has received the prior consent of that other person to provide his personal information.

Furthermore, in order to avoid any controversy, it should be noted that this data protection and Privacy Policy does not constitute a "Framework Contract" for the purposes of the EU Payment Services Directive 2 (EU) 2015/2366 or any implementation of this Directive in the Union and EEA (including, by way of example, any national laws implementing the EU's PSD).

1. For what purpose do we collect your data?

The personal information we process can be divided into three general categories of information:

1.1 Information we collect in order to fulfil our legal obligations and in order to provide access to our electronic money accounts as per contract signed.

This information is necessary to comply with our regulatory obligations and to ensure the execution of the contract between the parties. Without them, we may not be able to provide you with the services you request from Em@ney (us).

Registration and use of Account Information

In the case of opening an Em@ney account, we request some personal information such as:

Name and surname
Date of birth
Birth place
Email address
Nationality
Residence address
Mobile phone number
Identification document and all the data of the identification document
Type of identification document
Release date
Identification number
Issuing authority

And other data that we could choose to collect in our registration forms, necessary for the identification and adequate verification of our customers.

Information necessary for adequate customer verification

In accordance with our legal obligations with regard to **AML FT** (anti-money laundering and financing of terrorism) regulations, we are obliged to verify your identity or the identity of the authorized user who is requesting an account opening.

In order to comply with the **CRS / FATCA** regulations, we are required to request the tax identification number ("**TIN**"), the country of tax residence and the status of economic activity (active or passive). We may be required to disclose this information to the competent supervisory tax authorities.

Information related to risks and frauds

In order to comply with relevant **AML FT** regulations, personal data could be used for verification purposes as required by current legislation and included in certified databases for anti-terrorism checks.

We may receive information about your activities inside and outside of Em@ney through partnerships, or through your interactions with our partners and / or networks.

Source of income, estimated annual turnover on the account, details of the business

In order to comply with relevant anti-money laundering and counter-terrorism obligations, we collect personal data relating to sources of income and other similar financial information that could help us prevent money laundering and / or terrorist financing.

Payment card information

We collect information about your payment cards, which we have issued to you or which have been issued to you by third-party issuers and which are linked to your account. The information can be the following:

Card delivery address,

Card number (PAN),

Issuing date,

Expiration date

IBAN or other payment account identifier to which the card is linked, currency, card transaction data, spending limits, expired cards' details, SMS or other communications that the cardholder has received or has initiated with us, history of the status of the card, activation date, linked or duplicated cards.

Data records and information on the device

We automatically collect login and information on the device when you log in and use Em@ney services. This information includes, among other things:

Details on how you used Em@ney account (including if you clicked links to third-party applications);

IP address, access dates and times, hardware and software information, device information, information about device events, unique identifiers, crash data;

We collect this information in connection with our legal obligation to provide you with secure methods for monitoring your financial assets and personal data.

Payment transaction information

We collect information related to payment transactions through Em@ney, for example when you make purchases from merchants, receive money transfers, accept card payments, make payments using home banking or send money to friends and relatives.

Payment transaction information may include details of the payment instrument used, the date and time of the transactions executed by the user, the amount of the payment transaction, the payment due date, and the postal code of the payment instrument, billing, email address, IBAN or other account identifier information, your address and other transaction details.

This information is necessary to ensure the proper execution of the contract between us and to enable us to provide you with efficient electronic payment and payment services.

1 Information on the participants

When using Em@ney account, the collected personal data is provided by each participant, associated with the transaction.

Information about payment transactions can be the following:

- Sending or requesting money: when you send or request money through our service, we collect personal data such as name, postal address, telephone number and financial information relating to the person who receives and sends money. The extension of the personal data requested to a participant may vary depending on the service used.
For example, if you use the Em@ney system to charge a mobile phone, we may collect personal data and other information, including the other participant's number.
- Transfers of money from or to other financial institutions: if you use one of the functions of Em@ney to transfer money to accounts held with other financial institutions, we may collect your personal data with reference to the other party or from the other party on the payment transaction or provide the other financial institutions with identity verification information as required pursuant to Regulation 2015/847.

1.2 Information we collect with your consent

Additional Personal Information may be required in order to provide more service.
In this case, such additional information will be processed with the user's consent.

Other information

Furthermore, you can provide us information when you fill out a form, do a search, update or add information about your online account, in the event you respond to surveys, participate in promotions or use other features and provide statistical information, which help us to improve the quality of our service.

1.3 Information collected over the use of the Em@ney system

When using Em@ney, information may be collected, including personal information, about the services you use and how you use them. This information is deemed necessary, given our legitimate interest to providing and improving the features and services offered by us.

Geographic location information

Please note that when using the Em@ney system, it could be that some personal information is automatically collected as described in the previous sections. It can include

- information on geographic location, IP address, log data, device information, cookies and similar technologies, and payment transaction information.

2. How we use the information we collect

We use, store and process information, including personal information, to provide, understand, improve and develop services, create and maintain a secure environment, pursue our legitimate interests and comply with our legal obligations.

2.1 Provide electronic money and payment services

Start a payment, send or request money, accept payment by card,
Access to your online account or to your payment instrument;
Verification by sms for your account and payment instruments;
Communicating personal information with the third financial institution of the Participants in the payment transaction;
Create an account connection between your account and a third-party account or platform, if applicable;
Perform creditworthiness and other financial controls, evaluate applications and compare information for accuracy and verification purposes;
Detect and prevent fraud, abuse, security incidents and other malicious activities by blocking accounts or applying other prevention measures;
Conduct security investigations and risk assessments;
Conduct checks against databases and other sources of information;
Respect legal obligations (such as anti-money laundering regulations).
Apply our rights, interests and requests arising from legal agreements.

2.2. Provide, further improve and develop Em@ney

Allow the user to access and use their account;
Accept, process and administer online orders for payment cards;
Process purchase payments, issue invoices and / or other types of payment documents for the order processed;
Organize the shipment of ordered payment cards;
Operate, protect, improve and optimize the operation of the system;
Provide customer service;
Send support or support messages, updates, security alerts and account notifications.

If you provide us with information from your contacts, we can process this information:

- (i) to facilitate your payment transactions;
- (ii) to process your requests;
- (iii) for the detection and prevention of fraud and
- (iv) for any purpose you authorize at the time of collection.

To operate, protect, improve, optimize, customize the system, introduce new services, we process this information, considering our legitimate interest in improving services, and where it is necessary for the proper execution of the contract.

2.3 Creating and maintaining a safe environment

Detect and prevent fraud, spam, abuse, security incidents and other malicious activities;
Conduct security investigations and risk assessments;
Generate unique authorization codes (OTP) to access your online account and to execute the payment transaction;
Verify or authenticate the information or identifications you provide;
Conduct checks with databases and other sources of third-party information, including basic or police controls, data providers, credit bureaus to the extent permitted by applicable laws and with the consent of the user where required;
Monitor your payment transactions;
Resolve any disputes between you and our customers and other users and apply our agreements with third parties;
Enforce our legal rights.

We process this information, considering our legitimate interest in protecting the contractual obligations by observing the applicable laws.

2.4. Provide, customize, measure and improve our advertising and marketing activities

Promotional messages, marketing, advertising and other information related to Em@ney and non-affiliated business products and services that may interest you based on your preferences and social media advertising through social media platforms such as Facebook, LinkedIn or Google Business etc.

Provide personalized services, offered by us on third-party websites and online services. We may use Personal Data and other information collected in accordance with this Data Protection and Privacy Policy to provide a visualization and targeted functionality on third party websites.

Provide options, features, or location-specific offers if you decide to share geo-location information through the Services. We will use this information to improve security and provide you with a location-based service, such as advertising, search results, and other personalized content.

Customize, measure and improve our advertising.

Administer reference programs, awards, surveys, prize competitions, competitions or other promotional activities or events sponsored or managed by us or by our third-party partners.

For participation in games, quizzes and completion of a questionnaire or an entry form for the competition for promotional campaigns.

Conduct the profiling of your characteristics and preferences (based on information you provide, information obtained from third parties) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you.

We will process personal information for the purposes listed in this section, given consent in carrying out marketing activities to offer you products or services that may be of interest. You have the right to refuse the processing of your personal data for the purposes described above by withdrawing your consent at any time and for free.

3. With whom we share personal data

3.1. With third-party service providers:

We may share personal information with third-party service providers who support us in providing products and / or services with functions at our discretion and on our behalf.

For example, these third-party service providers can:

- Verify your identity or authenticate identification documents;
- Check information against public databases;
- Conduct basic or police checks, fraud prevention and risk assessment;
- Perform risk monitoring;
- Run the development, maintenance and debut of the product;
- Allow supply through third-party software platforms and tools (e.g. through integration with our APIs);
- Provide customer support;
- IT support and development services;
- Run courier services on our behalf;
- Provide cloud, storage or collocation services;
- Provide audit and accounting services;
- Provide legal, compliance or other advisory services;

3.2 Marketing and public relations services

These providers have limited access only to the information necessary to perform the activities for which they were contracted on our behalf and are contractually obliged to protect them and use them only for the purposes for which they were disclosed in compliance with Data Protection and Political Confidentiality.

3.3. With other financial institutions, which have been contracted to enable us to supply effectively *Em@ney Plc* to our customers:

These financial institutions may use this information only to enable us to provide you with the wide range of payment services. They can be:

Correspondent banks for the purpose of liquidation of money transfers and foreign exchange transactions;
National payment schemes for the purpose of managing national payments;
International payment schemes for the purpose of processing euro payments (SEPA);
Card companies for the purpose of issuing and purchasing cards;
Financial institutions

3.4. With other parties in transactions, such as other customers, merchants and their service providers:

We may share information with other participants in your transactions, including other customers or payers / beneficiaries from whom you send or receive funds, and merchants or service providers to pay for goods or services. Information includes:

- Personal data necessary to facilitate the transaction;
- Personal data to help other participants resolve disputes and detect and prevent fraud.

3.5. With other third parties for our legitimate interest or as permitted or required by law:

We may do share information about you with other parties for our legitimate interest or as permitted or required by law like in cases listed below:

- To do it in order to comply with a law, a legal process or regulations;
- To answer to law enforcement authorities or other government officials, or other third parties by virtue of a court summons, a court order or other legal process or requirement applicable to us or our business family;
- If we believe, in our sole discretion, that disclosure of Personal Information is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation into suspected or actual illicit activities;
- To protect a person's vital interests;
- With credit agencies and data controllers for credit reference checks and anti-fraud and compliance purposes;
- To investigate violations or impose a user contract or other legal terms applicable to any service;
- To protect our property, services and legal rights;
- Facilitate the purchase or sale of all or part of our business;
- In relation to shipping and related services for purchases made through a service;
- To help assess and manage risks and prevent fraud against us, our customers and fraud involving our websites, use of our services, including fraud that occurs in or involves our business partners, strategic initiatives or other individuals and traders.

With your consent:

We will also share your personal data and other information and with your consent we can provide aggregate statistical data to third parties, including other companies and members of the public, on how, when and why users visit our website and our services. This data will not identify you personally nor will we provide information about your use. We do not share your personal information with third parties for marketing purposes without your explicit consent.

3.6. Monitoring

We may monitor or record telephone calls, e-mails, web chats or other communications for regulatory purposes, security, customer service and training. When visiting our offices, CCTV, access control systems and / or other monitoring systems may be in operation.

3.7. Social Media

We may review and use comments and public opinions made on social network sites (i.e. Facebook Twitter, Google +, LinkedIn, YouTube, etc.) and to better understand our customers and our supply and future development.

4. Your rights

You may exercise any of the rights described in this section before processing your data in accordance with the Legal Agreements by sending an e-mail from your registered e-mail in accordance with the respective Legal Agreement below. Please note that we may ask you to verify your identity before taking further action on your request. Please note that upon receipt of the e-mail we will do our best to provide you with the requested information and resolve your request within a reasonable time, subject to all obligations that we or the affiliated companies have under applicable laws.

4.1 Administration of the information

You have the right to request and obtain the following:

- Confirmation if and where we are processing your personal data;
- Information on the purposes of the processing;
- Information on the categories of data processed;
- Information on the categories of recipients with which the data can be shared;
- Information on the period for which the data will be archived (or the criteria used to determine this period);
- Information on the existence of the rights of cancellation, rectification, limitation of processing and opposition to processing;
- Information on the existence of the right to complain to any Regulator.

Furthermore, it is possible to request a copy of the personal data processed.

4.2 Correction of incorrect or incomplete information.

You have the right to ask us to correct any inaccurate or incomplete personal information concerning you (which you can't correct or update yourself via your direct access to your Online account).

4.3 Access to data and portability.

You have the right to:

- Receive a copy of your personal data in a structured, commonly used, readable format;
- Transfer your personal data from one controller to another;

Store your personal data for further personal use on a private device;
Have your personal data transmitted directly between the controllers without hindrance.

In some jurisdictions, the applicable law may authorize you to request copies of personal information we hold about you.

4.4 Storage and deletion of data.

We generally keep your personal information for as long as necessary to fulfill the contract between you and us and to comply with our regulatory obligations. If you no longer wish us to use your information, you can request its cancellation and close your account. It will be closed on condition that your account is in good standing, not blocked or in any way limited by compliance, risk or regulation, or due to a suspension to us, court order, pledge or order from another regulatory body or other reason that prevents us by law to close your account or close the service. In the event that the Data Controller is a regulated financial institution, such as a credit institution, an electronic money institution or similar, the Data Controller is required to comply with the PSD and AML-FT laws to maintain personal information and transaction history for a period of 5 (five) years after the termination of the relationship with you.

Please note that if you request the cancellation of personal information:

We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and improvement of security. For example, if we suspend an account for fraud or security reasons, we may retain certain information from that account to prevent such customer from opening a new account in the future. We are also required to retain the personal data we have collected in order to comply with anti-money laundering and anti-terrorism legislation for a period defined by applicable law.

4.5 Withdrawal of consent and restriction of processing.

If you have consented to the processing of your personal data, you can withdraw your consent at any time by changing the settings of your account online or by sending a notice to us specifying the consent you are withdrawing. Please note that the withdrawal of consent does not affect the lawfulness of any processing activities based on such consent prior to its withdrawal.

In addition, the applicable law in some jurisdictions may give you the right to limit the ways in which we use your personal information, particularly where:

- (i) you contest the accuracy of your personal information;
- (ii) the processing is illegal and you oppose the cancellation of your personal information;
- (iii) we no longer need your personal data for the purposes of the processing, but you request information for the establishment, operation or defense of legal claims or
- (iv) the user has challenged processing and pending verification if our legitimate reasons ignore their own.

4.6 Objection to processing.

In some jurisdictions, the applicable law may give you the right to ask us not to process your personal information for specific purposes (including profiling for marketing purposes) where such processing is based on legitimate interests. If you dispute this treatment, we will no longer process your personal information for such purposes unless we are able to demonstrate valid legitimate reasons for such processing or such processing is required for the establishment, exercise or defense of legal claims. Please note that when Data Controllers are regulated financial institutions, such as credit institutions, electronic money institutions or the like, they are obliged by AML-FT laws to complete their clients' risk profiles at the opening of the relationship and update it constantly during the relationship and this is a legitimate reason. In case you do not want your personal data to be processed for certain purposes, which are legitimate purposes for us, you must close your account or we may have to discontinue the provision of some or all of the services, under certain conditions for the closure of the account, specified above in this section.

Where your personal information is processed for direct marketing purposes, you may at any time request us to stop processing your data for these direct marketing purposes by sending an e-mail to the contact e-mail address shown further down.

4.7 Complaints.

4.7.1 You should first try to resolve the issue by sending an e-mail to the respective Data Controller under this data protection and Privacy Policy from your registered e-mail address for the services:

Where the responsible Data Controller (as described in the introduction of the Privacy Statement) is specified as Em@ney plc Malta, you should contact:

Data Protection Officer (DPO): Francesco Maresca - dpo@emoneyplc.com

In the event that the user is not satisfied with the response or resolution of the respective Data Controller, he/she has the right to complain about the data processing activities we perform in front of the competent data protection supervisory authorities as mentioned below.

If the Data Controller is responsible for the respective processing of the data, he has the right to file a complaint with his principal supervisory authority, the Commissioner for the Protection of Information and Data Protection: Address: Level 2, Airways House High Street Sliema SLM 1549 Malta

Tel: +356 23 28 7100

e-mail: idpc.info@idpc.org.mt

5. Security

We take responsibility for ensuring that your personal information is protected, stored on encrypted servers, placed in special data centers in class A jurisdictions in Europe. To prevent unauthorized access or disclosure of information, we maintain physical, electronic and procedural safeguards that comply with applicable regulations to protect non-public personal information. Once you log in to your online account, all Internet communications are protected using Secure Socket Layer (SSL) technology with high quality security encryption (AES-256 keys, 256 bit, certified by COMODO ECC Domain Validation).

COMFORT ECC Domain Validation

We limit access to personally identifiable information only to employees who need to know such information in order to provide products or services to the user.

If you know or have reason to believe that your online account credentials have been lost, stolen or otherwise compromised or in the event of unauthorized or suspected use of your account, please contact us by following the instructions provided in the CONTACT US Section below.

While we are committed to protecting our systems and services, you are responsible for safeguarding and protecting the privacy of your passwords and online account / profile registration information and verifying that the personal information we process is correct and up-to-date.

6. Can children use our services?

The Em@ney system is not designed for individuals under the age of 18(eighteen). We do not collect knowingly information, including personal data, from children or other persons who are not legally able to use the system independently. If we obtain the actual proof that we have collected Personal Data from a person under the age of 18, we will remove it immediately, unless we are legally obliged to keep such data. Contact us if you believe you have mistakenly or inadvertently collected information from a person under the age of 18.

7. Changes to this data protection and Privacy Policy

We reserve the right to change this Privacy Statement at any time in accordance with its provision. If we make changes to this data protection and Privacy Policy you will be asked for a new consent on the use of your personal data.

8. Contact us

If you have any question about this Data Protection and Privacy Policy , please don't hesitate to contact us to the e-mail stated above in Section 4.