



Hapic LTD - Privacy Policy

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1. This Privacy Policy

Hapic LTD (hereinafter “**Hapic**” or “**we**”) is a company duly incorporated under the laws of the Republic of Cyprus (HE437449).

With this Privacy Policy, we would like to inform you about the nature, scope and purpose of the collection and processing of your personal data by Hapic, affiliated companies and/or partners, as well as the rights you have regarding your personal data.

Regarding the terms used in this Privacy Policy, such as “personal data”, “processing”, “processor” or “controller”, we refer to the definitions of the [EU General Data Protection Regulation](#) (Regulation (EU) 2016/679) (hereinafter “**GDPR**”).

This Privacy Policy applies to the visitors of our website and potential or existing customers of our services.

2. Responsible data controller

The **data controller** responsible for the collection and processing of your personal data collected in accordance with the GDPR is Hapic.

If you have any concerns, requests or questions about your data, or think that some of our privacy practices are not addressed in this Privacy Policy, please contact our Data Protection Officer at dpo@hapic.com

3. Why do we process your personal data (purposes and legal basis)?

3.1 Purpose

We process your personal data to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your personal data in any way, other than as specified in this Privacy Policy.

We collect Personal Data from any party with whom we will potentially be or already are in a contractual relationship for the provision of our professional services.

3.2 Data subjects we collect personal data from

We collect and process personal data from our potential customers and Website visitors.

4. Legal basis for processing your personal data

4.1 Contract

Collecting information for the opening of an electronic money account (hereinafter “**Payment account**”) with us requires processing of your certain personal data. For

instance, your phone number is needed for verification, your email address is needed for effective communication. These and other data required for opening and maintaining your payment account are processed by us and any other third parties who help us to provide services. The legal basis for this processing is that it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (Art. 6(1)(b) GDPR).

If you have any questions about your personal data and how Hapic collects it, please contact our Data Protection Officer at dpo@hapic.com

4.2 Legitimate interests

Sometimes we need to collect and process your personal data by virtue of legitimate interests (Article 6(1)(f) GDPR). Examples of such processing include (but not limited to):

- Ensuring IT security;
- Preventing criminal activity, such as fraud (we collect device and session data for this purpose);
- Push notification or messages relating to your existing or potential services and offers;
- Use experience analytics and optimization;
- Personalization of services and tariff options;
- Defence against legal claims.

4.3 Consent

If you gave us consent to process your personal data for one or more specific purposes (the examples are listed below):

- Adding a photo avatar and allowing us to show it to other clients, for example in their contact lists, shared banking activities, or referral links (if you chose to become visible as a client);
- To access contacts on your device;
- To place cookies on your device.

These data are processed according to GDPR. You are entitled to withdraw your consent at any time, for example by removing the photo or clearing your browser cache. However, keep in mind that the processing which took place before consent withdrawal remains in effect.

4.4. Legal obligation

When we or our partners/third party providers are required to comply with any applicable laws, your personal data is processed according to Article 6(1)(c) GDPR. Some examples of processing here include verification of your identity and age, prevention of money laundering and fraud, as well as statutory tax reporting obligations.

5. When we process your personal data

5.1 Payment account opening

In order to enter into a contract and open a Payment account, we collect the following personal data including but not limited to:

- Email,
- Phone number
- Country of citizenship
- ID document details
- Country of residence
- Place of birth
- Full name
- Date of birth
- Whether you are a US tax resident
- Employment status
- Residence address
- Customer ID (assigned by Hapic)
- Tax ID
- IP
- Browser and device information
- Geolocation
- Details of your company (as applicable)

5.2 Identity verification

To open a Payment account and provide you with our services, we are legally obliged to verify your identity. We perform verification via a facial picture (selfie) and ID document verification. For this you need to provide a valid copy of your government issued ID document and your facial picture.

5.3 Use of your Payment account

When you start using your Payment account, in addition to some of the personal data provided for opening of your Payment account, we process the following data:

- Transactions history (e.g. internal and external account numbers, IBAN, sender/recipient name, amount, currency data and time, customer ID, reference message)
- History of logins, locations and device data
- History of communications with you

5.4 Open banking

When you use open banking services you issue a permission to display information about your other personal or business accounts in the Hapic Personal Area and initiate a Payment transaction from various accounts via open banking. In this case the data we process

includes but is not limited to: full name, transaction details (e.g. amount, data and time, sender/recipient, description), your account balance, your Customer ID).

5.5. Communication with us

When you contact us via support chat or by any other means, we may process such categories of personal data as your email, phone number, Customer ID, language, country, as well as any other information about the standing of your Payment account or details about your transactions, depending on the issue you are experiencing. We may also collect other information if you choose to share it with us. Please do not share any additional data or documents, either concerning yourself or other individuals, unless specifically requested by us.

5.6 When you visit our website

When you visit our website www.hapic.com we may automatically collect some personal data from your device. This information may include your IP address, date and time of the request, browser language and version, operating system version or producer, information about your device, as well as some data about how you interact with our website (e.g. which website you came from, pages visited, links clicked). We do this to keep our website secure and to understand who visits it and which pages they find interesting, so we can improve the site and provide relevant content. Some of this data is collected using cookies. You can find more information about them in our Cookie Notice.

5.7 Analytics

We process the personal data you provide us with, as well as data created as a result of your use of our web application, for analytics purposes. For example, we analyse how you interact with the web application and make it more intuitive and easier for you to use, or to understand whether our products and services are customised to your needs so we can make changes and develop new products and services. In that case these data are stripped of direct identifiers to provide an additional layer of protection.

5.8 Direct marketing

From time to time we will contact you to tell you about our new products or services which we think may be of interest to you. This type of activity is considered direct marketing, and in this case we rely on your consent or our legitimate interest to process your personal data for this purpose. If you wish to withdraw your consent or object to this processing, you can switch off notifications in your Personal Area, or click on the “unsubscribe” link at the bottom of the email you receive from us.

6. Usage of your Personal Data

We take your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this Privacy Policy. Where you have consented

to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed in section 3 (three) above.

7. Who we share your personal data with

In order to provide you with our services, sometimes we have to share your personal data with affiliated companies, partners, external third party service providers and regulatory entities. They only process your personal data on the basis of data processing agreements (“DPA”) and according to strict instructions and regulations, which do not allow them to use your personal data for any other purpose without notifying you or asking for your consent.

5.1 Data transfers within the Hapic group of companies.

Within the Hapic Group, only those teams and employees will receive your personal data who need it to fulfil the contractual and legal obligations and our legitimate interests. We transfer personal data for the purpose of our daily business operations like account management and other operations requested by you, as well as to conduct internal administrative activities and improve our products and services.

5.2 Data transfer to public bodies and institutions.

We, our partners, service providers and others may also be required to share your 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 agents.

Additionally, we may reveal your personal data to third-parties if: (1) you request or authorise it; (2) to address emergencies or acts of God; and (3) to address disputes, claims, or to persons demonstrating provable legal authority to act on your behalf.

If you would like to receive more detailed information regarding third parties we share your personal data with, please contact us at DPO email.

5.3 Data transfers to third countries

Some of our partners, service providers or other parties we transfer your personal data to may be located in countries throughout the world, including outside the EU or the EEA. Therefore, the data may be sent to countries with different data protection laws than your country of residence. In such cases, to ensure that your personal data receives a comparable level of protection, we provide appropriate safeguards, such as adequacy decisions and frameworks or Standard Contractual Clauses approved by the European Commission. If you would like to receive more information about the transfers or safeguards, please contact us at dpo@hapic.com

8. How long do we keep your data

We keep your personal data for as long as it is necessary to achieve the purpose for which it was collected, usually for the duration of our contractual relationship plus any period

thereafter as required by applicable data protection regulation. When the purpose for processing is fulfilled, but we are required to keep the data, it will be restricted and stored in a secure archive until it can be deleted.

The details on the storage of your personal data:

Customer: we store personal data for the duration of the agreement and 36 (thirty six) months after the completion or termination;

Customer's user: we store personal data for the duration of the agreement and 36 (thirty six) months after the completion or termination;

Customer's End-User: We store personal data for 36 (thirty six) months.

Please note that you can exercise your right to delete your data. In this case, your data will be deleted from our servers within 30 (thirty) days of your request.

9. Your rights

Data protection laws provide you with rights to help you understand and control how your personal data is used. These are your rights:

- **Right to be informed** about why and how we are processing your personal data - we hope we achieved this by providing you with this Privacy Policy.
- **Right to have access** to your data - you have the right to ask us if we are processing your personal data, why we are doing so, under what lawful basis, the categories of your personal data, whether the data is being sent outside the EU, who we share your data with, how long we keep it, and request a copy of the data we are processing. If you are unable to find sufficient information in our Privacy Policy, please contact us at dpo@haptic.com
- **Right to object** to some processing - direct marketing, or if processing is based on legitimate interests.
- **Right to have your data deleted** - otherwise known as “right to be forgotten”. You can exercise this right if you withdraw your consent and there is no further legitimate interest in our processing of your data, your objection to processing under legitimate interests outweighs our interests, the processing is no longer necessary, there is a law that requires the data to be deleted, or the processing is unlawful.
- **Right to restrict processing** - if the personal data we are processing is inaccurate, if our processing is unlawful, if the data is no longer necessary for the original purpose of processing but needs to be kept for potential legal claims, or you have objected to processing carried out under legitimate interests and we're still in the process of determining whether there is an overriding need to continue processing.
- **Right to data portability** - you can ask for your data that we process by using a computer, which you provided to us on the basis of consent or because it was necessary for a contract.
- **Right to ask us about automated decision-making** - you have the right to ask us to explain the logic involved in making any automated decisions and for the decision to be reviewed by a human being, if that decision had an effect on your rights or freedoms.

- **Right to rectification** - if any of your personal data that we hold is inaccurate, you can request to have it corrected.
- You have the **right to lodge a complaint** with the competent data protection authority if you have concerns about how we process your personal data (a list of national and regional data protection authorities is available on this [website](#)). However, we would appreciate it if you contacted us first and gave us an opportunity to resolve the issue.

If you would like to exercise any of these rights, or find out more about how we process your personal data, please contact us at dpo@haptic.com. Reasonable access to your personal data will be provided at no cost. If access cannot be provided within a reasonable time frame, we will let you know the date when the information will be provided. If for some reason we cannot satisfy your request, we will provide an explanation why.

10. Security of your information

To help protect the privacy of personal data you provide through us with, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your data. We commit to taking appropriate disciplinary measures to enforce our employees' data protection responsibilities.

11. Changes and updates to this Privacy Policy

As Haptic and services we provide change from time to time, this Privacy Policy may change as well. We reserve the right to amend it at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy on our official website. We may email periodic reminders of our notices and terms and conditions and will notify you of material changes thereto, but you should check our website for the Privacy Policy that is in effect and any changes that may have been made to it.