



## PANPAY PRIVACY POLICY

### Preamble

Controller of your personal data shall be the PANPAY (refer to the entity listed in the chart below) with which you have a contractual relationship or pre-contractual relationship, to which you have submitted your personal data.

<b>Jurisdiction</b>	<b>Contracting Entity</b>	<b>Address for Notices</b>	<b>Governing Law</b>	<b>Jurisdiction</b>
North America	<b>PanPay USA Inc.</b>	100 Pine Street, Suite 1250, San Francisco, CA 94111	California, USA	California, USA
European Economic Area (EEA)	<b>PanPay Europe UAB</b>	Antano Tumėno g.4-27, LT-01109, Vilnius, Lithuania	Lithuania, E.U.	Lithuania
Hong Kong	<b>PanPay Hong Kong Limited</b>	Suite 1109, Ocean Centre, Harbor City, Tsim Sha Tusi, Hong Kong	Hong Kong	Hong Kong

Especially, PANPAY EUROPE UAB processes personal data under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and under other respective legal acts.

PANPAY processes personal data for the purposes: provide services. In such case, personal data may be processed on the basis of performance of an agreement; comply with applicable laws and regulations; protect and defend the yours and/or PANPAY's rights and legitimate interests.

### 1. Introduction

PanPay USA is authorized by the FinCEN of the United States under the Money Service Operator Regulations;  
PanPay Hong Kong is authorized by the Commissioner of Customs & Excise under the Money Service Operator Regulations;  
PanPay Europe is authorized by Bank of Lithuania (part of European Central Bank) under unrestricted E-money Regulations;  
PanPay Europe Financial Institution Code: 38700, PanPay Europe BIC (SWIFT): PAEOLT21.



In this privacy policy (“Policy”), we describe the information that we collect about you, that you provide to us, is provided to us by third parties, and will be processed by us, as you use this website (our “Website”) and the services available through this Website (collectively, our “Services”). We recommend that you read this policy carefully in order to understand what PanPay do with your personal information. Your use of our Website and Services and any dispute over privacy, is subject to this Policy and any of our applicable Terms and Conditions, including their applicable limitations on damages and resolution on disputes. Regardless of the applicable law set forth in the Terms and Conditions, however, please note that any disputes arising under this Policy will be interpreted in accordance with the Governing Law provision. By entering into the Agreement and the Terms and Conditions, you are specifically accepting the present PanPay Privacy Policy and consenting to the collection, processing and communication of your data as described in this PanPay Privacy Policy. Privacy Policy also describes your rights towards us and how to exercise them. You may always reach out to us on matters of privacy and data protection by sending an email to [contact@panpay.cn](mailto:contact@panpay.cn). The purpose of this Privacy Policy is to describe:

- i. The types of Personal Information we collect and how it may be used;
- ii. Our use of cookies and similar technology;
- iii. How and why we may disclose your Personal Information to third parties;
- iv. The transfer of your Personal Information within and outside of your home country;
- v. Your right to access, correct, update, and delete your Personal Information;
- vi. The security measures we use to protect and prevent the loss, misuse, or alteration of Personal Information.

## **2. How We Collect Information?**

### **A. Data Collected By Website Visitors**

PanPay automatically collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as when you register and open an account, browse our Website for informational use, contact us, use our customer portal or submit personal data. Our purpose in collecting non-personally identifying information is to better understand how our visitors use website, through cookies, web beacons, log files and other technologies:

- i. Browser type, Domain, Operating system, web pages you viewed, IP address, Data and time of requested, Time zone, Volume of data transferred, and etc.

For more information about “Cookies”, please see Section 8.

### **B. Data Provided By Users**

Data may be provided about yourself by filling in forms on our website, or by corresponding with us via email or telephone. The data you provide may include data about additional persons that are beneficial owners of the PanPay Services.

Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from being able to use PanPay’s services.

PANPAY collects your personal information from other external sources, such as public and

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private registers or other companies (i.e. credit bureaus).

### 3. Information We Collect

The types of information we collect about you depends on your particular interaction with us, our Website and our Services, and may include:

- i. Your contact information (e.g., name, email address, phone number, billing or mailing address);
- ii. Bank and credit account information;
- iii. Identity validation (e.g., photograph, other information requested to verify your information, including copy of valid ID document);
- iv. National identification numbers;
- v. Nationality;
- vi. Date and place of birth;
- vii. Details of any transactions carried out using any the services;
- viii. Any other information that you choose to provide to us (e.g., if you send us an email/otherwise contact us);
- ix. Calls/emails/other correspondence, voice records data (voice records of phone, Skype calls and other);
- x. Transaction place, IP address, login place, login of internet usage;
- xi. Information about the participation in legal entities, (including data managers and other persons having decisive votes, contact details of the representatives of the legal entities using or intending to use Services);
- xii. Information through Cookies and other tracking technologies as listed above and as described in the Section 8.

You are responsible for providing accurate and up-to-date information.

If you are required to provide information about shareholders or beneficial owners of your business, you acknowledge that you have that person's consent to provide his/her information to us.

### 4. How We Use Your Data

Personal data is used to provide, operate and improve our Services and to comply with local and international legislation applicable to the regulated entity within USA, European Union and Hong Kong. Data will be used to:

- i. Process your transactions, including transfers into the Peoples Republic of China in accordance with State Administration of Foreign Exchange regulations.
- ii. Perform the required controls and checks in accordance with ant-money laundering (AML) and know your customer (KYC) requirements, FATCA and Common Reporting Standard (CRS), book keeping laws and regulatory required capital adequacy requirements.
- iii. To protect our customers, employees or property — for instance, to investigate fraud,

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harassment or other types of unlawful activities involving us or other companies that we do business with, to enforce this Policy, as well as our Terms and Conditions.

- iv. To better understand how users access and use our Website and our Services, both on an aggregated and individualized basis, to administer, monitor, and improve our Website and Services, for our internal purposes, and for other research and analytical purposes.
- v. For the purpose for which you specifically provide the information to us, including, to respond to your inquiries, to provide any information that you request, and to provide customer support.
- vi. Contact and share the latest information and updates related to your use of the PanPay Services. We may also occasionally communicate company news, updates, promotions, and related information relating to similar products and services provided.

## 5. Disclosure

### A. Personal Information

PanPay may share your information only with third parties, including service providers, legal and regulatory authorities as required by applicable law (e.g., financial institutions), affiliated entities that need to know that information in order to process it or to provide services.

### B. Legal Authorities

PanPay may share your information with law enforcement, data protection authorities, government officials, and other authorities if we are required by law or you agreed to it. An example of legally required sharing is for purposes of anti-money laundering and counter-terrorist financing.

## 6. Transfer And Storage Of Data

Our services are global and data may be stored and processed in any country where we have operations or where we engage service providers. Data we collect may be transferred to and/or stored at a destination outside your country of residence, which may have data protection rules that are different from those of your country, including transferring data to and from regulatory authorities, or to staff operating outside the country who process data on our behalf or for one of our suppliers. Staff may be engaged in the fulfilment of your request and the provision of support services. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your data remains protected to the standards described in this privacy policy. By submitting the data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that the data is treated securely and in accordance with this Privacy Policy and the relevant data protection regulations.

PANPAY may only transfer the your data to third parties without informing the you separately beforehand for these limited purposes - to comply with requirements of mandatory

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applicable law; when PANPAY believe in a good faith that disclosure is necessary to protect our right and legitimate interests, protect safety of any person, prevent or address fraud or other misuses, security or technical issues, or respond to authorities' request; to share with PANPAY trusted business partners that have agreed to adhere to this Privacy Policy to the extent necessary for ensuring effective and satisfactory use of services.

For example, PANPAY may share data with law enforcement (Police), state authorities (State Tax Inspectorate (VMI), Social Insurance Fund (SODRA), Financial Intelligence Unit (FNIT)), if such duty is determined by the legislation.

In any other cases will not transfer the your data to third parties as a matter of course without asking for the your permission.

PANPAY stores your data for the certain periods of time described in legal acts.

For example, according to the anti-money laundering act, PANPAY is obliged to keep a record of your personal data for eight years (8) after services closure.

Once the statutory periods of data storage expires, the your data will be erased or anonymized.

## **7. Protection of Certain Personally-Identifying Information**

All data that you provide to us is stored on our secure servers. You are responsible for keeping your account credentials safe and secure and not sharing them with anyone.

In order to ensure the safety of the sensitive data, we use the SSL (Secure Socket Layer), a modern security technology, which means that all the communication between the your browser and PANPAY is encrypted, therefore, all data passed between the web server and browsers remain private and integral.

The transmission of information via the internet is not completely secure; any transmission is at your own risk. Although no one can guarantee the security of data transmitted via the internet, we do our best to protect the data transmitted via PanPay Account. We use industry standard security techniques to help keep the data safe including encryption when the data is in transit and at rest.

PanPay keeps your data only as long as necessary to fulfil our contractual obligations towards you and as required by statutory retention period. The data is kept only as long as necessary and/or mandated by law for the respective purpose.

## **8. Cookies And Other Tracking Mechanisms**

We use cookies and similar technologies as many other major websites to track information about your use of our Website and Services. We may use third party service providers to collect this information on our behalf.

### **A. Cookies**

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Website and Services, while others are used to enable a faster log-in

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process or to allow us to track your activities at our Website and Service.

## **B. How We Use Cookies And Tracking Mechanisms**

Our Website uses the following cookies/tracking mechanisms:

- i. Session cookies remain in the cookie file of your browser until you leave the site. These cookies are required for the operation of our Website and will be deleted after your web browser has been closed.
- ii. Persistent cookies remain in the cookie file of your browser for much longer. However, these cookies help us recognize you as a unique visitor when you return to our Website and to monitor your use of our Website.
- iii. Other necessary cookies, which are required for the operation of our Website.

## **C. Cookies Control**

Most web browsers automatically accept cookies, but if you prefer you can edit your browser options to block them in the future and/or delete all cookies that are already on your computer. If you do this, however, you may have to manually adjust some preferences every time you visit Website and some Services and functionalities may not work.

## **9. Your Rights Related To Personal Data Processing**

You and other data subject have the right:

- i. To request PANPAY to rectify inaccurate personal data;
- ii. To receive the personal data in a structured, commonly used and machine-readable format and have the right to transmit the personal data to another controller under certain conditions;
- iii. To access the personal data processes about you at PANPAY.
- iv. When processing of personal data is based on consent, to withdraw consent at any time;
- v. To request erasure or restriction of processing of the personal data;
- vi. To object to the processing of the personal data for specific purposes and under certain conditions;
- vii. To lodge a complaint with a supervisory authority in the respected jurisdiction, for example, Lithuania to the State Data Protection Inspectorate.

## **10. Privacy Policy Changes**

This Policy may be revised and changed over time as new features are added to services or there is any other reason suggested/recommended by our advisory, stakeholders or management. We may change this Privacy Policy at any time by posting a revised version of it on our Website. We will provide you with at least 30 days' prior notice of the effective date of the revised Privacy Policy when it is legally required. We may post the notice on the front page of our website(s) and/or send the notice by email. As of the effective date of the revised Privacy Policy, you will be considered as having consented to all changes to the Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time.

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