

Privacy Policy

Effective date: 01.12.2020

This Privacy Policy (hereinafter — the Policy) contains general principles of personal data processing, including the information rodypay (hereinafter — the rodypay) collects about you, what we do with it, and when we disclose it to third parties. Specific details on the personal data processing might be also included in agreements entered or to be entered between you and rodypay and are reflected in the rodypay app (hereinafter the App) and/or on our website www.rodycode.com (hereinafter — the Website).

rodypay ensures, within the framework of applicable law, the confidentiality of your personal data. For this purpose, rodypay has implemented appropriate technical and organizational measures to protect your personal data and provide transparent data protection rules.

rodypay has the right to improve or make changes to this Policy regularly and at any time. rodypay will inform you about any changes in the App and/or on the Website, as well personally.

1. Your personal data

1.1. What personal data does rodypay collect about me?

The personal data rodypay collects and processes includes the following:

Personal Data — your personal details and contact data, including full name, date of birth, personal identification code, citizenship, residency, residential address, tax residency, e-mail address, mobile phone number, occupation, identification document data, photo and/or video footage which you have forwarded to rodypay for the purpose of identifying yourself.

Due Diligence Data — Data that rodypay collects for the purpose of conducting due diligence under applicable anti-money laundering laws from you and appropriate databases.

Transaction and Payment Card Data — Details of any transfers made to and from Payment Account, including the name and account number of the payer and the payee, the date, time, currency, amount and explanation of the transaction, merchants' and ATMs' locations, payment card's number, cardholder name, the expiry date of payment card and the CVV number of payment card.

Device Data — Information regarding the device on which you are using the App and/or Website, including the device's model, name, or any other identifier and the IP address of the network from which you are using the App and/or the Website, including location information. **Preference Data** — Your preferences in the App and/or on the Website (language preferences, transaction limits, etc).

Customer Support Data — Communication between you and rodypay customer support (telephone conversations, emails, and chats).

Other Data — Other data not listed above, generated as a result of using the App and/or the Website.

1.2. What are rodypay legal purposes and basis for using my personal data?

Compliance Purposes — to perform any obligation under applicable laws, including the obligation to:

- avoid money laundering, terrorist financing, and fraud;
- ensure the fulfillment of international financial sanctions;
- ensure the security of payment services;
- provide tax authorities data as required under tax information exchange laws;
- comply with the lawful inquiries and orders of public authorities rodypay is obliged to cooperate with under applicable laws, such as courts, bailiffs, trustees in bankruptcy, the police, financial supervisory authorities, financial intelligence units, tax authorities, etc;
- other financial institutions rodypay is obliged to cooperate with under applicable laws, including, upon your prior authorization, payment information service providers and payment initiation service providers.

Contractual Purposes — to perform or enter into an agreement between you and rodypay.

Fraud Monitoring Purposes — to monitor and prevent payment fraud.

Analytical Purposes — to gain a better understanding of the preferences of rodypay customers and the way customers interact with the App and/or the Website.

Marketing Purposes — to provide you with marketing offers of rodypay services and additional features.

rodypay collects and processes your personal data on the following legal basis:

Contractual compliance — we need certain personal data to provide our services and cannot provide them without this personal data.

Legal obligations — in some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

Legitimate interests — we sometimes collect and use your personal data, or share it with other organizations and/or institutions, since we have a legitimate reason to use it, which is reasonable when balanced against your right to privacy.

Consent — an agreement in which you have consented to the processing of your personal data (for example, marketing purposes, etc.).

1.3. Does rodypay process my personal data for profiling or automated decision-making?

rodypay does not process your personal data for automated decision-making. rodypay is, however, obliged under law to assess the risk of money laundering, terrorist financing, and fraud associated with you and your transactions. This assessment is partly conducted by automated means and involves profiling. If rodypay makes an automated decision about you, you will have the right to ask to review it manually by a person.

2. Your rights

2.1. What are my rights?

In connection with the processing of your personal data, you have the following rights:

Right to Information — you have the right to receive the information provided in this Policy. The valid version of this Policy will be available in the App and/or on the Website at any given time.

Right to Access — you have the right to ask rodypay to provide you with a copy of your personal data processed by rodypay.

Right to Rectification — you have the right to ask rodypay to rectify your personal data in case the data is incorrect or incomplete.

Right to Erasure — you have the right to ask rodypay to delete your personal data unless rodypay is obliged to continue processing your personal data under the law or under the agreement between you and rodypay, or in case rodypay has other lawful grounds for the continued processing of your personal data. rodypay will, in any case, delete your personal data as soon as it no longer has lawful grounds for processing your personal data.

Right to Restriction — you have the right to ask rotypay to restrict the processing of your personal data in case the data is incorrect or incomplete, or in case your personal data is processed unlawfully.

Right to Data Portability — you have the right to ask rotypay to provide you or, in case it is technically feasible, a third party, your personal data provided by yourself to rotypay and processed in accordance with your consent or under the agreement between you and rotypay.

Right to Object — you have the right to object to processing your personal data in case you believe rotypay has no lawful grounds for processing your personal data. For any processing conducted in accordance with your consent, you can always withdraw your consent.

Right to File Complaints — you have the right to file complaints regarding processing your personal data.

2.2. How do I exercise my rights?

To exercise any of your rights established in the previous section, you may contact us by email at support@rodycode.com. For security reasons, we can't deal with your request if we are not sure of your identity, so we have the right to ask you for proof of your ID.

rotypay will make its best efforts to respond to your application within 1 week. Under GDPR art 12 (3) rotypay must respond to your application within 1 month. In case it is necessary due to the number and complexity of applications filed with rotypay, rotypay may, under GDPR art 12 (3), also respond to your application within 3 months.

3. rotypay and your personal data

3.1. Does rotypay share my personal data with anyone else?

Upon processing your personal data, rotypay may share elements of your personal data with the following third parties:

Public authorities and other financial institutions rotypay is obliged to disclose your personal data to under the law;

Server hosts hosting rotypay servers;

Payment processors and payment network operators processing your transactions;

Identification service providers helping rotypay to verify your identity and acquire Due Diligence Data;

Payment Card manufacturers manufacturing your payment card;

Communication service providers facilitating the emails, calls, SMS messages, and other communication between you and rodypay;

Couriers helping rodypay to deliver letters (e.g. letters with your payment card and PIN codes) to you;

Other parties involved with the provision of rodypay services.

The partners listed above may be located within and outside of the European Economic Area.

3.2. How does rodypay protect my personal data?

We use a variety of physical and technical measures to keep your personal data safe and prevent unauthorized access to your personal data, its use and disclosure. Electronic data and databases are stored on secure computer systems with information access control using both physical and electronic means. Our staff receives data protection and information security training. We have detailed security, IT infrastructure use, and data protection policies based on the need-to-know and less-privileged access principles. rodypay staff are required to follow the policies when handling your personal data.

We encrypt personal data, deploy firewalls, intrusion detection, and prevention systems to ensure that all your personal data is confidential and safe. While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorized access, we cannot guarantee it will be secure during transmission by you to our App, to the Website, or other services. We use HTTPS (HTTP Secure) with encrypted communication protocol for the rodypay App, the Website, and the payment-processing services. We regularly test our system and review applicable policies to make sure that our IT safety measures are one step ahead of any threat.

If you use a password for the rodypay App and/or the Website, you will need to keep this password confidential according to General Terms. Please do not share it with anyone.

3.3. How long will rodypay keep my personal data for?

According to anti-money laundering laws or with regard to Tax Residency Data under relevant tax information exchange laws, we generally keep your personal data for 5 years from the end of the financial year when the relationship between you and rodypay was terminated and your payment account was closed. Upon Estonian Financial Intelligence Unit request, this period may be extended up to another 5 years. Such a period may be longer, as it may be required by applicable local laws, for example, the transaction data

stored by rotypay for 8 years from the end of the financial year when the relationship between you and rotypay was terminated and your payment account was closed. We may keep your personal data for longer due to a potential or ongoing court claim or another legal reason.

After the periods stipulated in this Section above, rotypay will delete your personal data.

3.4. Does rotypay use cookies on rotypay Website?

rotypay uses cookies to analyze the way you use our website. Please refer to for more information about cookies.

3.5. Who is the data controller of my personal data?

**331536 York House Green Lane West, Preston, Lancashire,
United Kingdom, PR3 1NJ**

In case you have inquiries, requests, or complaints regarding the processing of your personal data, you may forward them to support@rodycode.com

In case you have complaints regarding the processing of your personal data, you may file them with the Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon) or the Data Protection Authority of the state of your permanent residence.