



## **Personal data processing policy**

### **1. General Provisions**

1.1. This Personal Data Processing Policy (hereinafter - the Policy) is an official document of FIRST CLASS PAYMENTS INC, located at C6 - 80 BIRMINGHAM ST TORONTO, ON, CANADA M8V3W6 (hereinafter - the Site Administration), and determine the procedure for processing and protection of information about individuals using the website **<https://1pay.is>** (hereinafter - the Site) and its services (hereinafter - Users).

1.2. The purpose of this Policy is to ensure proper protection of information about users, including their personal data, from unauthorized access and disclosure, to ensure the protection of human and civil rights and freedoms when processing their personal data

1.3. Relations related to collection, storage, distribution and protection of information about the Site users are regulated by this Policy, other official documents of the Site Administration and current legislation.

1.4. The current version of the Policy, being a public document, is available to any Internet user. The Website Administration has the right to make changes to this Policy. When making changes to the Policy, the Website Administration shall notify users thereof by posting a new version of the Policy on the Website not later than 10 days before the respective changes come into effect. Previous editions of the Policy shall be stored in the Site Administration's documentation archive.

1.5. This Policy is developed and used in accordance with the Public Offer posted on the Site. In case of any contradictions between this Policy and other official documents of the Website Administration, this Policy shall apply.

1.6. By accessing the Site and using its services, the User expresses his/her consent to the terms of this Policy.

1.7. In case the User does not agree with the terms of this Policy, the use of the Site and its services shall be immediately terminated.

### **2. Terms and Conditions of Use of the Site**

2.1. Providing services on the use of the Site and its services (hereinafter - the Site Services), the Site Administration, acting reasonably and in good faith, considers that the User:

- has all the necessary rights to register and use this Site;
- indicates true information about himself/herself in the amounts necessary for the use of the Site Services;
- is familiarized with this Policy, agrees with them and accepts the rights and obligations specified in them.

2.2. The Site Administration does not verify the reliability of the received (collected) information about users, except for cases when such verification is necessary for the purposes of fulfillment of obligations to the user by the Site Administration.

### **3. Objectives of information processing**

The Website Administration processes information about Users, including their personal data, in order to fulfill the obligations of the Website Administration to Users in relation to the use of the Website and its services.

### **4. Composition of user information**

#### **4.1. Personal data of Users**

Personal data of Users includes:

- 4.1.1. provided by Users and minimally necessary for using the Website services (name, surname, cell phone number and/or e-mail address, bank and other payment details)

- 4.1.2. additionally provided by Users at the request of the Website Administration in order to fulfill the Website Administration's obligations to Users arising from the Public Offer. The Website Administration has the right, in particular, to request from the User a copy of the identity document or other document containing the name, surname, photo of the User, as well as other additional information, which, at the discretion of the Website Administration, will be necessary and sufficient for identification of such User and will allow to exclude abuse and violation of the rights of third parties.

4.2. Other information about Users processed by the Website Administration The Website Administration may also process other information about Users, which includes:

- 4.2.1. additional data obtained when accessing the Site, including data on technical means (devices), technological interaction with the Site (including host IP address, type of user's operating system, browser type, geographical location, Internet service provider, access time, address of the requested page), and subsequent actions of the User on the Site.

- 4.2.2. information automatically received when accessing the Site using bookmarks (cookies).

### **5. Processing user information**

5.1. Processing of personal data shall be carried out on the basis of the following principles: a) lawfulness of the purposes and methods of personal data processing;

b) integrity;

c) compliance of the purposes of personal data processing with the purposes predetermined and declared at the time of personal data collection, as well as with the powers of the Website Administration; d) compliance of the scope and nature of processed personal data, methods of personal data processing with the purposes of personal data processing;

e) inadmissibility of merging databases containing personal data created for incompatible purposes.

- 5.1.1 Conditions and purposes of personal data processing

The Site Administration processes the User's personal data for the purpose of execution of the Public Offer between the Site Administration and the User.

#### - 5.1.2 Collection of personal data

Personal data of the User is collected on the Site when using the Site services, as well as in the future when the User at his/her own initiative provides additional information about himself/herself with the help of the Site tools.

#### - 5.1.3 Storage and use of personal data

Personal data of users are stored exclusively on electronic media and processed using automated systems, except for cases when non-automated processing of personal data is necessary due to fulfillment of legal requirements.

#### - 5.1.4 Transfer of personal data

Personal data of Users are not transferred to any third parties, except as expressly provided for in this Policy.

At the User's indication or in the presence of the User's consent it is possible to transfer the User's personal data to third parties-counterparties of the Website Administration with the condition of acceptance by such counterparties of obligations to ensure the confidentiality of the received information, in particular, when using applications. Provision of personal data of Users at the request of state bodies (local authorities) shall be carried out in the manner prescribed by the legislation.

In order to execute the agreement between the User and the Website Administration and to provide the User with access to the use of the Website functionality, the Website Administration develops the provided services and products, develops and introduces new services and products, optimizes the quality of services and products, improves the available functionality of the Website and services. To ensure the implementation of the specified purposes the User agrees to the implementation by the Site Administration with observance of the applicable legislation of service mailings to its address to receive feedback (including surveys) through the services of the Site Administration and/or services of third parties of electronic messages, sms and other types of mailings, as well as the collection, storage, accumulation, systematization, extraction, comparison, use, filling (clarification) of their data, as well as the receipt and transfer to affiliated persons and partners of the results of the survey.

#### - 5.1.5 Destruction of personal data

Processed personal data are subject to destruction or depersonalization upon achievement of processing purposes or in case of loss of necessity in achievement of these purposes, unless otherwise provided by the Federal Law. The user has the right to demand from the Site Administration to clarify his personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided by law to protect their rights.

## **6. Rights and obligations of users**

### 6.1. Users have the right to:

- 6.1.1. to provide free access to information about themselves by uploading their personal pages on the Website.
- 6.1.2. to demand from the Website Administration to clarify its personal data, block or destroy them in case such data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing.
- 6.1.3. on the basis of a request to receive from the Website Administration information related to the processing of his/her personal data.

## **7. Measures to protect information about Users**

7.1. Administration of the Site takes technical and organizational-legal measures in order to ensure protection of personal data of the User from illegal or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other illegal actions.

7.2. User's login and password are used to authorize access to the Site. The User is responsible for the safety of this information. The User has no right to transfer his/her own login and password to third parties, and is obliged to take measures to ensure their confidentiality.

## **8. Restriction of the Policy**

This Policy does not apply to the actions and Internet resources of third parties.

The Website Administration is not responsible for the actions of third parties who, as a result of using the Internet or the Website Services, gained access to information about the User in accordance with the level of confidentiality selected by the User, for the consequences of using the information, which, due to the nature of the Website, is available to any Internet user. The Website Administration recommends Users to take a responsible approach to deciding on the amount of information about themselves posted on the Website.

## **9. User communications**

9.1. Users have the right to send to the Website Administration their requests, including requests regarding the use of their personal data, provided for in clause. 6.1.3 of this Policy in writing to the address: C6 - 80 BIRMINGHAM ST TORONTO, ON, CANADA M8V3W6.

9.2. The request sent by the user must contain the following information:

- number of the main identity document of the user or his/her representative;
- information on the date of issue of the document and the issuing authority;
- information confirming the user's participation in the relationship with the operator
- the signature of the user or his/her representative.

9.3. The administration of the Site undertakes to consider and send a response to the received request of the user within 30 days from the moment of receipt of the request.

9.4. All correspondence received by the Website Administration from users (requests in written or electronic form) refers to information of limited access and is not disclosed without the written consent of the User. Personal data and other information about the User, who sent the request, cannot be used without special consent of the User, except for answering on the subject of the received request or in cases directly provided by the legislation.