

NellsPay Privacy Policy

Introduction

At NellsPay (“NellsPay”, “we”, “us”, or “our”), we are committed to respecting and protecting your privacy. This Privacy Policy explains how we collect, use, store, disclose, and safeguard your personal information when you access or use our services, website, mobile application, and other related platforms. It also outlines your privacy rights and how applicable laws protect you.

This Privacy Policy is supplemental to any other privacy disclosures that may be presented to you in connection with specific products or services. It is not intended to override those notices.

Who We Are

NellsPay is an international financial services provider specializing in cross-border remittance and payment solutions. NellsPay is registered as:

- A Money Services Business (MSB) with FINTRAC in Canada, Registration Number: C100000442
- An MSB with FinCEN in the United States, Registration Number: 31000295763326
- A company incorporated in the European Union (Lithuania), Company Code: 306951598

NellsPay is the controller of your personal information for the purposes outlined in this policy. For general inquiries, please contact: info@nellspay.com.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this policy. You may contact our DPO with any concerns or to exercise your privacy rights:

Attn: Data Protection Officer

Email: dpo@nellspay.com

Changes to This Policy

We may amend this Privacy Policy at any time. Any updates will be posted on our website and within our application. We recommend reviewing this Policy each time you interact with our services. If you do not agree with any part of the Privacy Policy or its changes, you may close your profile through our website or app.

Personal Information We Collect

We collect information necessary to provide and improve our services, comply with legal obligations, and protect our users.

For Website Visitors:

- Cookies and usage data as described in our Cookie Policy.

For Registered Users:

- Profile Creation: Name, address, date of birth, email, phone number, password, occupation, employer, identification (passport, driver’s license, or national ID), and proof of address.

- Transactions: Recipient's name, address, phone, financial institution details, and details regarding the transaction purpose and relationship to the recipient.
- Tiered Services: Additional information such as transaction history, payment method, average transaction size, frequency, recipient details, and funding source.
- Customer Support: Information provided when contacting customer service.
- Third Parties: Data from verification providers, transaction monitoring partners, and business partners.
- Technical Data: Device and browser information, IP address, usage logs, and cookies (see our Cookie Policy for details).
- Marketing, Surveys, Competitions: Name, email, and responses to surveys or promotions.

Use of Your Personal Information

We use your data for the following lawful purposes:

- Legal and Regulatory Compliance: To meet anti-money laundering (AML), counter-terrorist financing (CTF), and other regulatory obligations in all jurisdictions where we operate.
- Contractual Obligations: To deliver services you have requested, process transactions, and manage your account.
- Legitimate Interests: To improve our services, prevent fraud, ensure the security of our platforms, manage risk, and develop new products.
- Consent: For direct marketing and any other use that requires your explicit consent.

Profiling and Automated Decision-Making

We may use automated systems and profiling to:

- Assess eligibility for our services (including AML and sanctions checks)
- Detect fraud or suspicious activity
- Tailor marketing and service offerings

You may request human intervention in decision-making processes and have the right to contest certain automated decisions.

Sharing Your Personal Information

We only share your data with third parties necessary for service delivery, regulatory compliance, or with your explicit consent. Third parties include:

- Identity verification and fraud prevention providers
- Payment processors and financial institutions
- IT and cybersecurity service providers
- Regulatory bodies and government authorities (as required by law)

- Partners who provide complementary products and services
- Entities involved in any business restructuring or acquisition

A list of third parties specific to your use of our services is available on request at dpo@nellsipay.com.

International Data Transfers

Your information may be processed and stored in countries outside your country of residence, including Canada, the United States, the European Union, and the United Kingdom. We ensure all transfers comply with applicable data protection laws and that your data remains protected through appropriate safeguards.

Retention of Personal Information

We retain your information only as long as necessary to fulfil the purposes for which it was collected, to comply with legal requirements, and to resolve disputes. Typically, we retain personal data for 5 years after the last transaction or the end of our relationship, and up to 10 years for certain regulatory requirements.

Children's Privacy

NellsPay services are not intended for children under 18. We do not knowingly collect data from minors. If you become aware of a child using our services, please contact us so we can take corrective action.

Your Rights

Under applicable data protection laws, you may have the following rights:

- Access: Request a copy of your personal data.
- Rectification: Correct incomplete or inaccurate data.
- Erasure: Request deletion of your data under certain circumstances.
- Objection: Object to processing based on legitimate interests or direct marketing.
- Restriction: Request a restriction on processing your data in certain cases.
- Portability: Request transfer of your data to another service provider.
- Withdraw Consent: Withdraw your consent at any time for processing that relies on your consent.

To exercise your rights, contact our DPO at dpo@nellsipay.com. We may require verification of your identity before fulfilling your request.

Security

We implement industry-standard security measures, both organizational and technical, to protect your personal data from unauthorized access, loss, misuse, or disclosure. While we strive to safeguard your information, please note that no method of data transmission or storage is completely secure.

Links to Third-Party Websites

Our website and applications may contain links to third-party sites or services. We are not responsible for the privacy practices or content of those external sites. Please review their privacy policies before submitting any personal data.

Contact Us

For questions, concerns, or to exercise your data rights, please contact:

Data Protection Officer

Email: dpo@nellsplay.com

This Privacy Policy is issued by NellsPay and applies to all users of our services globally.