

NepaliPay Privacy Policy

Effective Date: 18 February 2026

Last Updated: February 2026

Jurisdiction: Australia

1. Introduction

NepaliPay ("NepaliPay", "we", "us", or "our") operates a beta-stage financial technology platform accessible via mobile application (the "App") and related services (collectively, the "Services").

We are committed to protecting your personal information and handling it responsibly in accordance with:

The Privacy Act 1988 (Cth) (Australia)

The Australian Privacy Principles (APPs)

Other applicable data protection laws where relevant

This Privacy Policy explains:

What information we collect

How we use it

When we share it

How we protect it

Your rights

By using the Services, you agree to this Privacy Policy.

2. Important Clarifications

NepaliPay is a technology platform and is not a bank.

Certain financial services are provided by third-party regulated providers.

We do not control the independent privacy practices of third-party financial institutions or blockchain networks.

3. Information We Collect

We collect information in the following categories:

3.1 Account Information

When you register:

Email address

Phone number (if provided)

Basic profile information

Authentication identifiers (via Web3Auth or similar provider)

3.2 Identity Verification (KYC) Information

To comply with regulatory and fraud-prevention requirements, we may collect:

Government-issued ID images

Selfie / liveness verification

Name, date of birth, address

Risk scores and verification status

Identity verification is processed by providers such as SumSub.

We may store:

Verification references

Status results

Audit timestamps

We aim not to store biometric templates unless legally required.

3.3 Financial & Transaction Information

When you use financial features:

Deposit and transfer amounts

Transaction timestamps

Reference IDs

Counterparty identifiers (where applicable)

Limited card metadata (brand, last 4 digits, expiry month/year)

Full card numbers are processed by payment providers such as Stripe and are not stored by NepaliPay.

Card issuance data may be processed by providers such as Lithic.

3.4 Blockchain & Stablecoin Data (If Applicable)

Where blockchain-based transfers occur:

Public wallet addresses

Transaction hashes

Settlement references

Blockchain networks are public and outside our control.

3.5 Bank Linking Data

If you connect a bank account:

Bank verification tokens

Account metadata

Processed via providers such as Plaid.

3.6 Device & Technical Information

Collected automatically:

IP address

Approximate country (via Cloudflare headers)

Device model

Operating system

App version

Crash logs

Usage analytics

Security event logs

3.7 Location Information

We may collect approximate IP-based location automatically.

If enabled, precise location may be used only at the time of sensitive transactions for fraud prevention and geo-fencing.

We do not continuously track your location unless you explicitly enable such a feature.

4. How We Use Your Information

We use your information to:

Provide and maintain the Services

Authenticate users

Verify identity (KYC/AML)

Prevent fraud and abuse

Process transactions

Reconcile payment events

Comply with legal obligations

Communicate important service updates

Improve system reliability and performance

We do not sell your personal information.

5. Legal Bases for Processing

Where applicable, we process personal information based on:

Performance of a contract

Compliance with legal obligations

Legitimate interests (fraud prevention, system security)

Your consent (where required)

6. Sharing of Information

We may share information with trusted service providers necessary to operate the Services, including:

Stripe (payment processing)

Lithic (card issuing)

SumSub (identity verification)

Plaid (bank linking)

Circle or blockchain infrastructure providers (settlement events)

Web3Auth (authentication and key management)

Supabase (database and infrastructure services)

Cloudflare (network security and geo-fencing)

Push notification providers (Apple APNs / Google FCM)

We may also disclose information:

- To comply with law enforcement requests
- To comply with sanctions and AML obligations
- To prevent fraud or illegal activity
- In connection with a merger, acquisition, or asset transfer

7. International Data Transfers

Your data may be processed in jurisdictions outside Australia, including the United States and other regions where our providers operate.

We take reasonable steps to ensure data is handled securely and in accordance with applicable laws.

8. Data Retention

We retain personal information only as long as necessary to:

- Provide the Services
- Comply with legal obligations
- Resolve disputes
- Prevent fraud

Financial and identity records may be retained for 5–7 years where required by AML or financial regulations.

9. Security

We implement safeguards designed to protect your information, including:

- Encryption in transit (TLS)
- Encryption at rest where appropriate
- Access controls and role-based restrictions

Row-Level Security (RLS) policies

Audit logging

Idempotent transaction protections

However, no system can guarantee absolute security.

You are responsible for maintaining the security of your device and authentication methods.

10. Your Rights

Under Australian law and applicable regulations, you may:

Request access to your personal information

Request correction of inaccurate information

Request deletion (subject to legal retention requirements)

Requests can be sent to:

Email: contact@nepalipay.com

We may require identity verification before responding.

11. Children

The Services are not intended for individuals under 18 years of age.

We do not knowingly collect personal information from minors.

12. Beta Status Notice

NepaliPay is currently offered as a beta-stage platform.

Features, data flows, and providers may change during development.

We may update this Privacy Policy as the Service evolves.

13. Changes to This Policy

We may update this Privacy Policy periodically.

Changes will be reflected with a revised "Last Updated" date.

Continued use of the Services after changes indicates acceptance of the revised policy.

14. Contact Information

For questions or privacy-related requests:

NepaliPay

Email: contact@nepalipay.com