## **Privacy Policy**

Last Update: February 2022

This Privacy Policy (the Policy) explains the purpose and ways of collecting, using, sharing, and protecting the personal data of customers by IDTS GROUP LTD and its website https://PAYB.IO (hereinafter: PAYB).

### **Our company**

All personal info is collected, processed, and maintained by *IDTS GROUP LTD*, *Craven House*, *40-44 Uxbridge Road*, *London*, *W5 2BS*, *UK* to ensure full compliance with, but not limited to, the EU's General Data Protection Regulation (GDPR).

## Personal information we may collect

PAYB may collect specific personal information while providing our Services, that is:

- Information required to complete an order using PAYB, ie.: Full Name, Delivery Address, Phone Number (if required by the seller) amongst others.
- Information about completed and fully settled orders.
- Other information which we may collect by an automated process. Through the use of PAYB, our webpage collects details like the date & time of your visit, your IP address, device, and system information, which we may collect through automated means. Through your use of our Services, including exchange tools, we also monitor and collect tracking information related to usage such as access date & time, device identification, operating system, browser type, and IP address. This information may be directly obtained by Us or through third-party services.
- In case of triggering a KYC verification, our third-party ID verification provider will gather more personal details, like your ID details and your current residence. Such data is necessary to fulfill the requirement of the Know Your Customer procedure imposed by UK and EU respective regulators and it is stored on secure servers of the aforementioned provider.

## How does PAYB use your data?

PAYB collects Personal Data in order to:

- To maintain our website Services.
- To improve our website Services.
- To be fully compliant with our legal duties as a UK-based entity not only with the KYC procedures but also with Anti-Money Laundering and Anti-Terrorism Financing rules enforced by the Financial Conduct Authority (FCA) and local laws in the EU.

- To prevent any possible fraud or any other suspicious or illegal activities.
- To send occasional emails (newsletters). They are not obligatory and are shared only with your consent. You may withdraw your consent by pressing "unsubscribe", located in the footer of every promotional email.

#### **Retention of Personal Data**

We will keep your information on the record only for as long as it is necessary to maintain the order history for a specific customer.

Our customers have the right to request the removal of their personal data. In such a case, the customer has to request it via email at *contact@payb.io* or chat. PAYB then will erase any personal data that law allows us to, as in certain cases PAYB is obliged to store your information to be legally compliant.

### **PAYB's Cookie Policy**

Cookies are small files stored in your browser and they may include an anonymous identifier (IP address, MAC address, etc.) of your device. PAYB requires cookies to be enabled, access to PAYB may be restricted otherwise.

We use cookies to improve the customer experience, add new content and measure its popularity, or keep track of all your general activity on PAYB. Cookies also help us prevent any unwanted activity on our site as well as improve the security of you and your funds while using PAYB.

More info about disabling, enabling, or managing cookies by your browser can be found here: <a href="https://www.allaboutcookies.org/">https://www.allaboutcookies.org/</a>.

# PAYB & Security

We use certain security measures to keep your details safe, including additional firewalls and secure servers. PAYB however does not guarantee that these measures will stop all illegal, unforeseen, or unwanted activity on our website. In such situations, we will be contacting local law enforcement or any anti-fraud-focused entities like <a href="https://www.actionfraud.police.uk/">https://www.actionfraud.police.uk/</a>.

#### **How We Can Disclose Your Information?**

We may initiate an Agreement with a third party that might require to know the personal data in order to provide a contractual service. Such entities are required to follow this Policy to the letter and may be limited to data that is required in order to complete the newly established

cooperation. We are mostly referring to providers who handle KYC (Know Your Customer), PEP (Politically Exposed Persons), or KYT (Know Your Transaction). In such a situation, you as our customer agree that we will share your information with a contracted third party in full compliance with this Policy.

We also reserve the right to share your data when there is suspicion of illegal or unwanted activity, for the purpose of preventing such occurrence.

## **Your Rights**

In accordance with UK & EU laws, every customer has rights related to their Personal Information. You as our customer have the right to:

- Access and update the data we store about you.
- Request a copy of your data.
- Delete your Personal Information. You may request to remove the personal data If you do not want to use our Services or want your data to be erased, you can request us to remove them. Be it partial or full deletion of your data, we will process your request to the extent allowed by the respective applicable laws. Please be advised that some data needs to be stored to be legally compliant.
- Restrict the processing of your data. In such a case, data will be stored but not used. This also applies to any unwanted marketing content shared by us via a newsletter service. You can request it via email or by clicking the "Unsubscribe" button at the bottom of the email.
- Place a complaint to Financial Conduct Authority (FCA) in the UK.

# **Changes to Policy**

This document can be updated or changed without prior notice at PAYB's own discretion. Please, review this section periodically as by using PAYB you accept and agree to this Policy and our Terms of Use.

#### **Contact Us**

If you have any questions about this Policy or our procedures in general, please contact us via *contact@payb.io*.