

This Privacy Policy is an overview of how Primex Payments d.o.o. (hereinafter, “Primex Payments”) collects, uses, and processes your personal data when you use VLoad Digital Cards (hereinafter, the “Services”, or “Vload”, or “VLoad Digital Cards”).

Please read this Policy carefully, as it becomes legally binding when you use the Services. Primex Payments takes privacy and protection of your data very seriously and is committed to handling the personal information with the utmost diligence.

Responsible Entity

The entity responsible for the collection, processing and use of personal data is:

- Primex Payments d.o.o., with registered address located at Strojarska cesta 20, Zagreb (Croatia), registered in the court register of the Commercial Court in Zagreb, holding MBS number 080985910, holding OIB number 84324054341.

If you have any questions about how Primex Payments handles or protects your data, you can contact the Compliance department at dpo.eu@vloadcards.com

Data Primex Payments collects about you

Primex Payments will collect and process the following data about you:

(a) Information you give Primex Payments:

- you may give Primex Payments information about you when you sign up to use the Service (for example when you provide us with personal details like your name and email address). This also includes information you provide through your continued use of our Services. The information you give us may include, among others: your name, address, email address, passport and/or National ID, phone number, financial information (including your debit/credit card, your bank account information), source of funds, source of wealth, payment details, geographical location, tax identification number, photograph and video interview.
- The content of your communications with us, which we collect via telephone call recordings, online chat, emails and other means.
- In some cases, including when you send high value transaction, or where we need to comply with anti-money laundering regulations, we may also need more identification from you, including a copy of your bank account statements.
- Please ensure that your personal data is current, complete and accurate by logging onto your account and updating it whenever necessary.

(b) Information Primex Payments collects about you:

- Primex Payments may automatically collect details of the transactions you carry out when using the Services, including geographic location from which the transaction originates;
- Primex Payments may automatically collect technical information (including IP address, device fingerprint, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform);

(c) Information Primex Payments receives from other sources:

- Primex Payments may receive information about you from third parties that Primex Payments is working with closely (for example payment service providers that are

collecting the payments you are making for the purchasing of VLoad Digital Cards, providing Primex Payments with your basic personal information as well as your financial information such as limited information regarding your payment card details);

(d) Information from social media networks:

- if Primex Payments enables this option and you decide to log in to our Services using your social media account (for example, Facebook or Google) Primex Payments will receive relevant information that is necessary to enable the Services and authenticate you. The social media network will provide Primex Payments with access to certain information that you have provided to them. Primex Payments uses such information, together with any other information you directly provide to Primex Payments when registering or using the Services.

Minor's data

The Services are directed at adults aged 18 years and over, and not intended for children. Primex Payments does not knowingly collect data from this age group. The verification process implemented by Primex Payments prevents processing and storing this data. If any data is collected from a child without verification of parental consent, it will be deleted.

How Primex Payments protects your personal information

Primex Payments takes the safeguarding of your information very seriously, and take a number of steps to ensure it stays secure:

- Communication over the Internet between you and Primex Payments servers is encrypted;
- Primex Payments' technical security team proactively monitors for abnormal and malicious activity in the servers and services;
- Primex Payments restricts access to your personal information to those employees of Primex Payments who have a business reason for knowing such information.

Purposes of the data processing and legal basis

Primex Payments processes your personal data for the following purposes:

- To carry out Primex Payments' obligations relating to your contract with Primex Payments and to take steps at your request prior to entering into such contract;
- To comply with any applicable legal and/or regulatory requirements;
- To administer our Services and for internal operational, planning, audit, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To pursue Primex Payments' legitimate interests provided that these legitimate interests are not overridden by your interests or fundamental rights and freedoms;
- To prevent and detect crimes, including fraud and financial crime;
- To notify you about changes to our Services and send you other administrative information;
- To enforce our Terms and Conditions with you.

Primex Payments' legitimate interests include:

- Keeping the Services safe and secure;

- Constantly improving the Services and to ensure that they are presented in the most effective manner;
- To perform a task carried out in the public interest (such as the prevention of money laundering and terrorism financing;

Disclosure of your information

Primex Payments may share your information with selected third parties including:

- Affiliates, business partners, suppliers and subcontractors supporting Primex Payments in the provision of the Services;
- Payment services providers that are processing your payments and/or are providing payment services needed for the provision of the Services (for example banks);
- Business partners, suppliers and subcontractors that help Primex Payments to perform and execute the Services and/or mitigate fraud (for example Refinitiv is the provider of World-Check which is used for screening sanction lists, IDENTT Poland Sp. z o.o. is the provider of IDENTT which is used for identity verification);
- Analytics that assist in the improvement and optimization of our website;
- Limited information is sent to payment beneficiaries when you initiate a payment transaction;
- if Primex Payments needs to protect its rights, including exchanging information with other companies and organizations for the purposes of fraud protection;
- To prevent and detect fraud or crime and to assist us in conducting or co-operating with investigations of fraud or other illegal activity where we believe it is reasonable and appropriate to do so.
- If Primex Payments is under a duty to disclose or share your personal data in order to comply with any legal obligation;
- In response to a warrant, court order, properly constituted police request or as otherwise required by law.
- If you consent, to share your details when using our Services.

If you would like further information, you can contact the Compliance Department at dpo.eu@vloadcards.com.

Sharing and storing your personal data

The Services are provided by Primex Payments, an entity duly incorporated in Croatia. When you open VLoad Digital Cards or you use the Services, your personal data will be processed by Primex Payments. For the avoidance of doubt, by submitting your personal data, you agree to this transfer, storing and processing.

In order to provide the Services to you, Primex Payments may transfer and store your data at a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of the suppliers supporting Primex Payments. Such staff may be engaged in, among other things, supporting in general operational matters and the provision of customer support services. By submitting your personal data, you agree to this transfer, storing and processing. Primex Payments will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

In the event that Primex Payments transfers your data to third parties that are based outside of the European Economic Area, Primex Payments will ensure that the third parties take adequate and appropriate technical, physical and organizational security measures to protect your data.

Automated Decision Making

Primex Payments may use Automated Decision Making (ADM) to help fight financial crime. Primex Payments may use ADM to verify that your IP location matches with the information regarding your residency that you have provided during the registration, or to verify that the account holder of your payment method matches with your account details.

Cookies

Primex Payments uses cookies for the purposes of ensuring the functionality and security of the website and the Services. As the processing is necessary for the purposes of legitimate interests, this is, to ensure the functionality and security of the website and the Services, Primex Payments is not requiring your consent for this processing.

Data Retention

Given the nature of the Services, Primex Payments is required to store some of your personal and transactional data beyond the closure of your account. Primex Payments will only access your data internally on a need-to-know basis and will only access or process it if absolutely necessary. If you want to know more about this, contact the compliance team at dpo.eu@vloadcards.com.

Primex Payments will always delete data that is no longer required by a relevant law.

Your rights

You have the right to access information held by Primex Payments, which include, subject to applicable provisions of the data protection legislation, the following:

- Provide you with a copy of the information that you have provided to Primex Payments;
- Provide you with further details on the use Primex Payments makes of your information;
- Update any inaccurate, incorrect, or out of date personal information;
- Delete any personal information that is no longer necessary, or no longer subject to a legal obligation to which Primex Payments is subject to (Primex Payments has legal obligations so it may not be possible to delete your data at the time of request. Once the required time has passed then Primex Payments will be able to comply with your request);
- Where processing is based on consent, to withdraw your consent requesting Primex Payments to stop the processing;
- Adjusting your notification preferences in the settings section of your account;
- Object to any processing based on ground of the legitimate interests unless Primex Payments' reasons for undertaking that processing outweigh any prejudice to your data protection rights.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime).

If you exercise any of these rights, Primex Payments will check your entitlement and respond in most cases within a month.

If you have any questions in relation to the use of your personal information, you can contact the compliance team at dpo.eu@vloadcards.com.

Third-party links

The Services may, from time to time, contain links to and from the websites of partners and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that Primex Payments does not accept any responsibility for them. Please check these policies before you submit any personal data to these websites.

Changes to our privacy policy

Primex Payments may revise this Privacy Policy at any time without notice provided that is needed to keep up with changing legislation. Likewise, Primex Payments may revise this Privacy Policy at any time without notice for the purposes of keeping up with best practices and changes in how Primex Payments processes personal information, provided that is for your interest or when the applicable legislation entitles Primex Payments to do so. Primex Payments will post the revised version on this website and when possible, Primex Payments will notify you via email or via push-up notification when you will access your account. In all other cases, Primex Payments will revise this Privacy Policy as per the legal requirements of the applicable legislation.

VLoad Digital Cards website

When you visit and use the website, Primex Payments will process your IP address, Google Analytics ID, internet browser and device type, location data and your use of the website.

Primex Payments uses this data for our legitimate interests of making sure the website works properly, including debugging, for DDOS mitigation on the website, and improving the website and to perform statistical analyses for optimizing the website.

Primex Payments collects this data using cookies and similar techniques.

Primex Payments will always only keep your data for as long as Primex Payments reasonably needs it for the purposes listed above.

If you have any questions about how Primex Payments handles or protects your data, you can contact the Compliance department at dpo.eu@vloadcards.com.