

MGL WALLET PRIVACY NOTICE

Version 1.1/2022

Last updated: August 30, 2022

Introduction

MGL WALLET LTD (hereinafter "**Data Controller**", the "**Company**" or "**MGLW**"), a Company registered in the Republic of Cyprus operating under EMI license number 115.1.3.34 issued by the Central Bank of Cyprus (hereinafter "**CBC**") values the relationships with all its customers, website visitors and stakeholders (hereinafter "**Data Subjects**"). This notice explains how the Company collects, processes and manages your personal data. The Company will process all personal data in compliance with the General Data Protection Regulation (hereinafter the "**GDPR**") and any applicable local privacy law. This is to provide you with a service you have requested and to meet our statutory obligations.

In this privacy statement "**we**", "**our**" and "**us**" refer to the Company. Please visit our website <https://mglwallet.com> for more information.

1. What personal data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The Company collects personal data from you when you volunteer to provide such personal data, when you interact with our services or when you visit our website. Other personal data relating to you, may also be provided to us by other 3rd parties.

We collect the following types of personal data which we divided in groups:

From our clients/ potential clients:

- **Identifying Data:** name, surname, date of birth, address, identity card number (passport, ID card), identity card photograph, nationality, country of birth, sample of your signature, and if he/she is a businessperson a trade licence ID and address of the registered office.
- **Contact Data:** telephone number, email address, delivery address, access data to enable communication between you and us electronically.
- **Product and Service Data:** data related to your account number, contract number, use of products/services or preferred language, geolocation data, transaction data, recommendations and offers.
- **Data from mutual communication:** data from the use of our website and applications, and contact information through any contact point (how long, on which topic and which communication channel), including complaints and service requests.
- **Minors:** minor child certificate, national ID or passport information. We collect and process data of minors only when consent is given or authorised by the holder of parental responsibility over the minor.
- **Other data:** such as camera recordings, telephone conversations.
- **Voluntary information:** other types of information that you voluntarily choose to provide to us.

From the users of our website:

- **Technical Data:** including the IP address used to connect your computer to the Internet, your login information, browser type and version, the full Uniform Resource Locators ("**URL**"), clickstream to, through and from our website (including date and time) as well as other information regarding your experience on our website such as page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.
- **Location Data:** We may receive information about your location. We may determine your location through your IP address and, when accessing the website through a mobile device, by using the data that we collect from this device. This includes information about the wireless networks or cell towers near your mobile device at the time of access. Our website uses cookies to distinguish you from other users of our website. This helps ensure that we provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

We also collect, use and share Aggregated Data such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data by law, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

*We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so, pursuant to applicable laws or regulations.

We shall use the information obtained from the website to administer our website and for internal operations, including troubleshooting and in order to keep our website safe and secure to improve our website to ensure that content is presented in the most effective manner for you and to ensure that content displayed on the website is presented in a user-friendly manner.

From potential employees:

We collect personal data from candidates for recruitment purposes. The information that we may collect and hold about candidates includes:

- Name, address, telephone number(s) and email address
- Details of qualifications, skills, experience and employment history
- Details of current immigration status
- Any additional information contained in a candidate's CV such as referee information disclosed at interview or otherwise provided to us during the recruitment process.

We need to process data to decide whether to enter into a contract of employment with a particular candidate and may also process certain data to ensure that it is complying with its legal obligations. We have legitimate interest in processing personal data during the recruitment process and in keeping records of the process in order to manage the recruitment process. It is required to assess and confirm a candidate's suitability for employment and decide to whom to offer a particular role. We may also need to process candidate's data to respond to and defend itself against legal claims.

We will not share a candidate's data with third parties, unless we have his or her consent, his or her application for employment is successful and an offer of employment is made to him or her. Once an offer of employment has been made and accepted by a candidate, we may also contact the previous employers named by that candidate as referees for the purpose of obtaining employment references.

2. Data Accuracy

It is important that the data that we hold about you is accurate and up to date. In the event that your data changes please notify us so that we can update our records.

3. How we collect your personal data

We use different methods to collect data from and about you including:

Directly from you: you may provide to us data in the following circumstances: by filling in an enquiry form on the website, by corresponding with us by post, phone, e-mail or otherwise when you apply for our services, subscribe to our services or publications, request marketing to be sent to you, give us feedback, to conduct business relationship with us in relation to our activities or to start negotiations for or entering into a contract to supply services to us. To the extent you engage our services you may be required to provide further information. Where you are a business user, we may also require further information before we enter into a commercial relationship with you.

From third parties on your behalf: we may receive your data from a third party such as any related companies to you, lawyers acting on your behalf etc.

Automated technologies or interactions: as you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please read our Cookies Privacy Notice for more information.

Third parties or publicly available sources: We may receive personal data about you from various third parties and publicly available resources such as public registers and lists.

4. How we use your personal data

Services: to facilitate the provision of services which you request and where we need to perform the contract we are about to enter into or have entered into with you and to be able to provide and subsequently charge for any related services and to facilitate any special requests or assistance that you have requested.

Payments: in order for us to process your transactions.

Improve our services and products: during our business relationship we might ask for your feedback in relation to our services which it will be used later on for the further improvement of our services and to resolve any issues which you have reported and provide support related services.

Comply with legal or regulatory obligation: your data might be used to comply with the requirements imposed by our auditors, financial reporting requirements, government authorities and to cooperate with law enforcement agencies, government authorities, regulators and/or the court.

Legitimate Interests: where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Service Personalisation: we may use your data to personalise our services to match your personal needs.

Suppliers: manage the supplier relationship you have with us.

Marketing: We may use your personal data to share an idea of what products or services we think you may want or need, or what may be of interest to you. You will only receive marketing communication from us if you have opt-in of receiving marketing material.

We will get your express opt-in consent before we share your personal data with any company outside our Company for marketing purposes.

You can ask us or third parties to stop sending you marketing material at any time by contacting us above or clicking on the opt-out link included in each marketing message.

Should you choose to opt out of receiving our marketing material, we will continue to carry out our other relevant activities using your personal data.

5. Lawful Basis for processing

Performance of a contract with you: the processing is necessary either due to a contract we have with you, or because we have asked you to take specific steps before entering into a contract.

Legal Obligation: In circumstances where it's our legal obligation to disclose or share your data in order to comply, with our regulatory obligations or contractual obligations, or to protect the rights, property, or our safety, or others. This may include the exercise or defence of legal claims or in order to comply with an order of any court, tribunal or authority or disclosure to a government or regulatory entity.

Legitimate interest: The processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests. For example, it is our legitimate interest to advertise our services and provide details of any program. We will process your data to understand your preferences and requirements to provide our best services and products.

Before we process your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law), we make sure we consider and balance any potential impact on you and your rights before we process your personal data.

Consent: In case where you have given a clear consent for us to process your personal data for a specific purpose. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you, processing personal data of minors and use of cookies by our website.

You have the right to withdraw consent at any time by contacting us. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

6. Disclosure

We will not disclose your personal information without your prior consent however, depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed as follows:

To Regulatory bodies and/or other authorities/organisations/companies: We may disclose your data to regulatory bodies to enable us to comply with the law and to assist fraud protection. We may also disclose your data if we are under a duty to disclose or share your personal data to comply with any legal obligation, judgment or under an order from a court, tribunal or authority. We may also disclose your data to enforce our Terms of Use, or to protect our rights, property or safety, that of our partners or other users of our website. This includes exchanging information with other companies and organisations and authorities for the purposes of Anti-Money Laundering/KYC checks, Anti-Bribery/Corruption law provisions compliance and/or fraud protection.

To Commercial Service Providers and Suppliers: We may outsource the processing of certain functions and/or information to third parties that provide services (acting as data processors) and are involved in the fulfilment of our services to you. Other service providers include consultants and advisors, financial institutions and legal consultants.

Third Party Access To Your Personal Data: We work closely with third parties in order to provide you the services you request. These third parties include cloud storage providers, analytics providers and search engine information providers. We will only work with third party providers that comply with applicable laws in the jurisdictions which we operate and abide by the GDPR and, if applicable, agree to be bound by the standard contractual clauses to adequately protect and safeguard your personal data.

Third party marketing: Where you have consented for us to do so, we may provide your data to selected third parties who may contact you about their goods or services that you may be interested in.

Third-party links: This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

When we share your personal data with third parties we make sure that they use the same level of protection we use, respect and protect the security of your personal data in accordance with the applicable law (including the GDPR) and apply adequate security measures and safeguards.

7. Cross-Border Data Transfers

The Personal Data and other information that we collect from you may be transferred and stored at a destination outside the European Economic Area (“**EEA**”). It also may be processed by staff operating outside the EEA who work for us or other entities acting as data processors processing data on our behalf. This includes staff and providers engaged in, among other things, the fulfilment of your request or order and the provision of support services. More information on to whom your data is disclosed can be found in the “Disclosure” Section.

To comply with applicable data protection law, we will implement international data transfer agreements on the basis of EU Standard Contractual Clauses in order to provide appropriate and suitable safeguards for Personal Data that may be transferred to countries outside the EEA where an adequate level of protection is not already guaranteed.

8. How long we keep your information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. We will only store data for as long as is required to fulfill that purpose or for the purpose of satisfying legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use and/or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and also the applicable legal requirements.

In any case, retention of data shall not exceed 5 years from the date of termination or completion of the services. This period of retention enables us to use the data for defending potential legal claims, taking into account the applicable limitation periods under relevant laws, as well as, if applicable, to comply with Anti-Money Laundering/KYC laws and regulations, Anti-Bribery/Corruption law provisions and regulations, accounting and tax laws, applicable to certain jurisdictions which we operate in.

Data that is processed with your consent shall be kept by us for as long as the consent is validly granted. For the avoidance of doubt, the consent and change or revocation of the consent of our Company shall be retained by virtue of its legitimate interests for the entire duration of its consent and 5 years after its expiration.

In some circumstances you can ask us to delete your data. In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. What are your rights?

In this Section, we have reiterated the rights that you have under data protection law. Your rights are not fully explained in this section. You should read the related legislation, published by the regulatory authorities for complete clarification of these rights.

Your rights under data protection law are:

- **the right to access;**
You have the right to receive a copy of the personal data we hold on you as well as information about how it is used.
- **the right to rectification;**
You have the right to ask us to correct personal data we hold on you where it is incorrect or incomplete.
- **the right to erasure;**
This right entitles you to require the erasure of your personal data from our systems and records. However, this right applies only in certain circumstances (e.g. where we no longer need the personal data for the purpose for which we collected it or where you withdraw consent to our use of your personal data and where there is no other legal basis for continuing to use it).
- **the right to restrict processing;**
This right entitles you to restrict the processing of your personal data by us. Where this right is exercised, we are still permitted to store your personal data but other use of the data is prohibited, save in certain limited circumstances.
- **the right to object to processing;**
You have the right to object to our use of your personal data in certain circumstances. However, we may continue to use your personal data, despite your objection, where there are compelling legitimate grounds to do so or we need to use your personal data in connection with any legal claims.
- **the right to data portability;**
This right allows you to obtain your personal data in a format that enables you to transfer that personal data to another organisation where we are processing your personal data on the basis of consent or on the fulfilment of a contract and if processing is carried out by automated means. You may have the right to have your personal data transferred by us directly to the other organisation if this is technically feasible.

- **the right to complain to a supervisory authority;**
You have the right to lodge a complaint with the [Data Protection Commissioner](#) if you think that we have not processed your personal data in accordance with data protection legislation and,
- **the right to withdraw consent;**
You have the right to withdraw your consent to the processing of your personal data by us at any time. This will not affect the lawfulness of our processing before the withdrawal.

If you wish to exercise any of the rights set out above, please contact us through our Data Protection Officer via email at dpo@mglwallet.com so we provide you with the necessary information.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you believe that our processing of your personal information trespasses data protection laws, you have a legal right to report a complaint with a supervisory authority accountable for data protection as state above.

10. Failure to provide personal information

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or we may not be able to perform the services as agreed. In case you fail to provide the required data, we may have to terminate that contract with you as a result, but we will notify you if this is the case at the time.

11. Modifications of this policy

We may revise this policy occasionally by publishing a new version on our website.

You may choose to check this page on a regular basis to note any changes to this notice.

We might inform you of significant changes to this policy by email or through a private messaging system on our website.

12. Contact us:

If you have any question about this Privacy Notice or our data protection practices, please contact us by writing to our Data Protection Officer.

Our Data Protection Officer's contact details are:

E-mail: dpo@mglwallet.com

Address: 71 Agias Fylaxeos &, Arch. Makarios III Avenue, Safe Bulklers Tower, Office 201, 3087, Limassol, Cyprus