



INSTAREM PRIVACY POLICY

PRIVACY POLICY

UAB “Instarem EU” (InstaReM), code 304548794, having the license issued by the Bank of Lithuania No. 14 on 28 of September 2017, respects your rights to privacy. InstaReM deals with personal information collected in accordance with this Privacy policy (Privacy policy) when you visit or use our website or mobile application in the European Economic Area (EEA). When used in this policy, “personal information” refers to any information or opinion, which relates directly or indirectly to you. This includes any information that can be used to distinguish, identify or contact you.

Our policy is to comply and ensure that our employees comply with the requirements of any applicable laws and legal acts of the Personal Data protection on the level of country where we operate as well as with applicable legal acts of the European Union. InstaReM will commit itself, on its own initiative, to follow the good practice principles provided by the Bank of Lithuania (https://www.lb.lt/the_good_practice_principles_1)

InstaReM is registered in the State Register of Personal Data Controllers in the Republic of Lithuania and the company is given the data controller identification code P8072.

Please read the following carefully to understand our practices regarding Personal Data and how Instarem will process it.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We use your information in the following ways:

- provision of payment services and issuance, distribution and redemption of electronic money;
- to carry out our obligations relating to your contracts with us;
- to conduct the customer identification;
- to provide you with the information, products and services that you request from us;
- to comply with any applicable legal and/or regulatory requirements;
- to notify you about changes in our Services;
- to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to provide you with information about other similar goods and services we offer, if we have your consent for this;

- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you, if we have your consent for this.

HOW DO WE COLLECT PERSONAL INFORMATION?

Most of the personal information is collected directly from you by the following means:

- Through the access and use of the InstaReM website or mobile application;
- Through your registration for our Services and/or by setting up an account with us;
- Through your response to our loyalty program, a contest or claim to a prize announced by us from any financial transaction you make with InstaReM;
- Through your subscription to our electronic publication such as newsletters, rate broadcast;
- From 3rd party connected with you and/or dealing with us;
- From the commercial banks and finance institutions (the data are received during the execution of payment operations).

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT AND RESERVE?

The types of personal information that we collect and share depend on the product or service you avail with us. It includes, but is not limited to:

- Contact and personal information: title, your first name, surname, date of birth, email address, mobile phone number, personal code, residential address and/or mailing address, data of the personal identity document, photo, signature, employment status, source of funds, driving license number, sex, citizenship.
- Instarem makes your identity verification using Jumio Corporation solution if you express your consent using, as well comparing, live photograph data of yourself and your ID document. Your data will be retain how long it is necessary to carry out identity verification and for the period required by laws on Anti-Money laundering. Please read more about Jumio Corporation solution for identity verification here <https://www.jumio.com/>. If you do not feel comfortable with this identification method you may contact us at support@instarem.com for alternative way to identify yourself.
- Account information: financial institution account number, IBAN, debit card number. Account information: account details and transaction history, date of the transaction, amount, currency, location, data about beneficiary (natural person's name, date of birth, personal identification number or other unique character sequence assigned to this person for identifying the person; the

legal entity's name, legal form, registered office, code if any) and other details about the parties involved.

- Other information: video and audio records of video calls for identification, telephone conversations, IP address.
- Details of client visits to website, app and the resources that clients access.
- Data collected about legal entities:
 - I. Representatives of legal entities (members of the management bodies and other representatives (for example, employees) who are authorized to represent the client in relations with the controller or acting on their behalf, representing the client on behalf of the client, according to corporate documents): personal identification number, identity document details, workplace, e-mail address, gender, position, surname, nationality, telephone number, name, photo, signature, bank account information (bank name and bank account number), monetary transaction or transaction date, amount, currency, the data on the beneficiary of the funds (natural person's name, date of birth, personal identification number or other unique character sequence assigned to this person for identifying the person; the legal entity's name, legal form, registered office, code if any).
 - II. Beneficiaries of legal entities (natural persons who directly or indirectly own or control a legal entity, having a sufficient number of shares or voting rights, including through bearer share management): personal identification code, identity document, gender, surname, nationality, name, photo, signature, the number of shares held, the voting rights or the share capital held, the date of the monetary transaction or transaction, the amount in the currency in which the monetary transaction or transaction is carried out, the data on the beneficiary (natural person's name, surname, date of birth, personal code or other unique character assigned to this person to identify the person; the legal entity's name, legal form, home address, code, if any).
- For the purpose of direct marketing:
 - I. Name, surname, telephone no., e-mail address, address, date of birth.

WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

We may share your personal information with other companies in the InstaReM Group as well as with users of payments services and financial institutions, the Bank of Lithuania and participants of SEPA (due to the using of Single Euro Payments Area -SEPA). Sometimes we may disclose your personal information to organizations outside the InstaReM Group such as:

- to our contractors or service providers for the purposes of conducting business and providing our services or products to you, including web hosting providers, IT systems administrators and payment processors;
- to our intermediary banks in order to process certain transactions on your behalf, for example, by disclosing your name and address;
- to any of our partners, agents or intermediaries who are a necessary part of the provision of our products and services;
- to international intermediaries to complete your transactions;
- to any government regulatory bodies that normally require it or may request it.

We ensure that taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, we implement appropriate technical and organizational measures to protect your Personal Data. We ensure that the same requirements on the technical and organizational measures are applied by the parties to whom we may transfer your data.

SECURITY OF INFORMATION COLLECTED

To help protect your personal information from unauthorized access and use, we endeavor to use reasonable security measures. These measures can include physical, electronic and procedural safeguards such as computer safeguards and secured files and buildings. We also endeavor to limit access to personal information to only employees, agents and representatives that need to know. Despite our efforts, third parties may unlawfully intercept or access your personal information, transmissions to us, or may wrongly instruct you to disclose information to them by posing as InstaReM or by misinforming you about our Services. Always use caution and good judgment when sending money and when using internet and mobile technologies.

DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS?

We may disclose your personal information to recipients located outside EEA. These entities may include:

- InstaRem Group companies;
- InstaRem Group service providers; and
- International Intermediaries

To effect, administer and complete transactions or deliver products or services including, but not limited to:

- Companies which help us run or improve the running of our business or which help us deliver products and services to you and to banks, card companies, reference agencies, etc.
- In order to comply with legal, regulatory, security and processing requirements, government (domestic and international) requirements, applicable to us or our affiliates or service providers, including but not limited to anti-money laundering laws; and
- To organizations which help us process transactions, validate customer information, and prevent debt, fraud, theft or loss.

DO WE USE OR DISCLOSE PERSONAL INFORMATION FOR MARKETING?

We will use your personal information to offer you products and services that we believe may interest you only if we have your consent for this kind of offering. We will not do if you withdraw your consent.

Please be informed that you shall have the right to refuse from the processing of your Personal Data for the purpose of direct marketing by the same method as you consented with the processing of personal data for direct marketing. The services can be unsubscribed by updating your profile page on InstaReM website.

We may disclose information about current and former customers to perform marketing, business analysis and advertising services to companies with whom we have contractual or joint marketing arrangements upon notice that you have provided unambiguous consent (opt-in) for the use of Information for these purposes.

We also have relationships with advertising companies, who may use cookies, pixels, web beacons, app or device information or related information to display advertising tailored to your interests or location. To opt-out of tailored advertising delivered by other advertising companies, you should choose the appropriate settings in your browser(s) (e.g., block cookies), device (e.g., turn "Location" off) and app(s). Please note that if you do not accept cookies or change your device or app settings, you may experience some inconvenience in your use of our website or app and some online or mobile products and services.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

In accordance with statutory regulations on data protection, you have the right to access the Personal Data relating to you and which has been collected or

disclosed by us and the right to have such Personal Data rectified in case such Personal Data is inaccurate or incomplete. You have the right:

- to check whether we hold your Personal Data;
- to access your Personal Data;
- to request that we correct any of your Personal Data that may be inaccurate; and
- to inquire about our policies and practices in relation to Personal Data and to be informed of the kind of Personal Data held by us.

In this respect, you may receive a copy of the Personal Data that we hold on file. For any further copies, we reserve the right to charge a reasonable fee based on administrative costs. To exercise this right, please contact us as indicated in this Privacy Policy.

All other rights of data subject are granted to you according to the applicable law and in compliance with our internal rules of Personal Data protection.

We retain your Personal Data for the period necessary to carry out the purposes outlined in this Privacy Policy, unless a longer period is required or permitted by law.

CHANGES IN THE PRIVACY POLICY

InstaRem reserves the right to modify this Privacy Policy, however, your privacy will not be reduced without your consent. We urge you to review this Privacy Policy when you visit to obtain the most current version.

RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS - YOUR RIGHTS

If you are concerned about how your personal information is being handled or if you would like to make a complaint, please contact us on the details provided under 'Contact us'.

You may request (by contacting us in the manner set out below) details of the information we hold and request us to correct or erase any erroneous or out-of-date information. We reserve the right to independently verify any claims made.

To protect your privacy, we shall take reasonable steps to verify your identity before correcting any information per request. Where permitted by law, we reserve the right to collect a service charge for providing you any information in connection with your request.

In case if you do not feel satisfied with the solution of your complaint, you have the right to make a complaint to the authorities responsible for the personal data protection as well as to apply to the competent court.

CONTACT US

You can contact us by writing to us at support@instarem.com or post us at UAB “Instarem EU”, code 304548794, registered address at Mėsinių str. 5, LT-01133 Vilnius, the Republic of Lithuania.

Our Privacy Officer can also be contacted in relation to privacy concerns by writing to privacy@instarem.com

**THANK
YOU**