



PRIVACY POLICY

v1.0 as of 04/11/2022

by
SnapSwap International S.A. (“we”, “our”, “us”).

We are committed to protecting and respecting your privacy. If you have any questions about your personal information please chat with us through the SnapSwap website, or by emailing us at hello@snapswap.eu.

“You” refers to the business and people who are authorised to use the account. If more than one person is authorised to give instructions on the account, “you” or “your” can refer to any or all of those people.

If you give us personal data about other people (like directors, owners, business partners or employees), or you ask us to share their personal data with third parties, you confirm that you have been authorised by them to disclose information about them, and that they understand how we shall use their personal data.

The information we hold about you

Information we hold about you and people connected to your business will often come from you directly (for example, when you apply to open an account). That information will include:

- our own records of your shareholders (including beneficial owners), suppliers and companies you use or may have agreements with;
- employers;
- other directors, partners, beneficial owners, signatories or employees in your business;
- people appointed to act on your behalf;
- information submitted through our app or website.

For example, when you sign up to the account and provide details such as your name, ID, selfie and address, or details we collect about how you use the account and website.

There may be times when you give us “sensitive” information, which includes things like your racial origin or biometric data. We shall only use this information in strict accordance with the law.

Details about your transactions with us

Including any accounts you use.

Information on how you use your phone / computer

For example the mobile network / internet provider you use, your IP address or operating system and the settings on your phone / computer.

Information you give us permission to access on your phone

Things you give us explicit permission to see, like your address book, photos, geolocation and data from your camera.

Information from social networks or online accounts

Information from any accounts that you share with us.

Cookie information

Read our Cookie Policy for more info on what cookies are and how we use them.

How we use your information

To provide our services we use it to:

- Help us maintain the account;
- Track, analyse and improve the services we give you and other customers.

To meet our legal obligations we use it to:

- Search your record at fraud prevention agencies;
- Prevent illegal activities like money laundering, tax evasion and fraud;



- Make responsible credit decisions.

To exercise what is known as our legitimate interests. This is when we use data for a reason which is in your and/or our interest, and which does not involve overriding your privacy rights. We use it to:

- Market products and services;
- Search your record at credit reference agencies when you sign up.

With your permission we use it to:

- Check your credit history if you apply for a certain product;
- Market and communicate our products and services and those of affiliated partners where we think these will be of interest to you by email. You can always unsubscribe from receiving these if you want to, by email and via the website.

Who we share it with

We may share your personal information with:

- Wallee Group companies and their relevant subcontractors;
- Anyone who works for us when they need it to do their job';
- Any organization which supports any of our services you use, when they need it to offer those services, including:
 - Credit reference agencies;
 - Analytical, Know Your Customer (KYC) and cyber security service providers;
 - Customer "interface" providers (like the ones who manage our chat service);
 - Public authorities as required by law;
 - Partner financial institutions (correspondent banks, etc.);
 - Customer AML screening solution providers;
- Companies that do advertising for us (but we shall not share identifiable personal data with third parties for their own direct

marketing unless you give us permission, and you can opt out any time);

- Certain authorities that detect and prevent terrorism (including foreign authorities if your payments are processed through a cross border payment systems);
- Anyone who you give us explicit permission to share it with.

We shall also share it to comply with the law, to enforce our Terms and Conditions or other agreements, or to protect the rights, property or safety of us, our customers or others.

How long we keep it

We keep your data as long as you are using our service, and for 5 years after that to comply with the law. In some circumstances, like cases of anti-money laundering or fraud, we may keep data longer if we need to and/or the law says we have to.

Your rights

You have a right to:

- Access the personal data we hold about you, or to get a copy of it;
- Make us correct inaccurate data;
- Ask us to delete, "block" or suppress your data, though for legal reasons we might not always be able to do it;
- Object to us using your data for direct marketing and in certain circumstances "legitimate interests", research and statistical reasons;
- Withdraw any consent you have previously given us.

To do so, please contact us through the website or by email to "hello@snapswap.eu".

Where we store your data

We might transfer and store the data we collect from you outside the European Economic Area ("EEA"). People who work for us or our suppliers outside the EEA might also process your data.



We may share data with organizations and countries that:

- The European Commission says that have adequate data protection;
- We have agreed on data protection clauses.

Being a regulated financial institution obliges us to maintain the secrecy of your information entrusted to SnapSwap while using our product. However, such secrecy requirement ceases where the disclosure of your information is authorized or required by legislation or public authorities.

How to make a complaint

If you have a complaint, please contact us through the website or by email to "hello@snapswap.eu" and we shall do our best to resolve the issue in the most efficient way.

Please know that you can refer your complaint to The National Data Protection Commission (Commission Nationale pour la Protection des Données) of Luxembourg. For more details, you can visit their website at <https://cnpd.public.lu/>.

Changes to this policy

We shall post any changes we make to this policy and we shall let you know by email.