



Overview

Azure Payments Ltd (“Azure”, “we”, “us”) has developed this privacy policy (the “Policy”) to explain how we may collect, retain, process, share and transfer your personal data through our services and via our online presence, which includes our website <http://www.azurepay.io>. We are committed to protecting and respecting your privacy. This Policy also describes how we use personal data, with whom we share it, your rights and choices, and how you can contact us about our privacy practices. This Policy does not apply to third-party websites, products, or services, even if they link to our services or sites, and you should consider the privacy practices of those third parties carefully. This Policy (together with our Terms) constitutes the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using our services or visiting our website you are accepting and consenting to the practices described below.

Information you provide us

You may provide us information about you by filling in forms on our website or by contacting us via e-mail or otherwise. This includes information you provide us when you submit an application to use our services, search for a product or service on our website, and when you report a problem with our site. The information you provide us may include:

- your name;
- birth date;
- physical appearance (photo);
- address;
- passport/ID details (including image);
- e-mail address and phone number;
- financial and credit card information;
- information regarding your business, types of goods and services you provide as well as information on the representatives and shareholders of your business (including information/data mentioned above).

By submitting the application, you confirm that you are authorised and have the necessary consents to disclose the personal data provided in the application to us. We shall not be liable for any claim brought by any individual arising from an act or omission resulting from your failure to ensure that the transfer of the personal data was lawful.



Information we collect about you

Every time you visit our website, we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information regarding your visit, including the full URL clickstream to, through and from our site (including date and time);
- products and services you viewed or searched for;
- page response times, download errors, length of visits to certain pages, page interaction information (such as clicks, scrolling, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

We also may collect information about your online activities on our website and connected devices over time and across third-party websites, devices, apps and other online features and services.

Cookies

Our website doesn't use cookies.

Use of the received and collected information

We may use the information about you in the following ways:

a. Information you provide to us

We may use the information:

- to evaluate your application to receive our services;
- to carry out our obligations arising from any contract concluded between you and us and to provide you with the information, products and services that you request from us;
- to enable fraud protection and risk management processes such as checking third party sanctions lists and other databases to ensure that you are eligible to receive our services;
- to monitor, prevent and detect unauthorised payment transactions;
- to comply with our legal compliance obligations;
- to respond to enquiries, send service notices and provide customer support;
- to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you with information about other products or services that may interest you;
- to inform you about changes to our service; and
- to ensure that the content of our website is presented in the most convenient manner for you and for your device.



b. Information we collect about you

We may use this information:

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that its content is presented in the most convenient manner for you and for your device;
- as part of our efforts to keep our website safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other visitors of our website about products or services that may interest you or them.

Disclosure of your information

We may share your personal data with any member of our group, which means our affiliated companies, our subsidiaries, our ultimate beneficial owners and their subsidiaries.

We may share your personal data with selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- advertisers and advertising networks that need the data to select and serve relevant ads to you;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if Azure or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or
- to protect the rights, property, or safety of Azure, our clients or business partners. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.



Storage of personal data

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your personal data against loss, misuse, unauthorised access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centres, and information access authorisation controls. Your personal data is only accessible to a limited number of personnel who need access to the information to perform their duties.

While we are dedicated to securing our systems and services, you are responsible for securing and maintaining the privacy of your password(s) and account/profile registration information and verifying that the personal data we maintain about you is accurate and current. We ask you not to share a password with anyone. We are not responsible for protecting any personal data that we share with a third-party based on an account connection that you have authorised. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please contact us immediately.

Unfortunately, no data transmission or storage system can be guaranteed to be completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

If you are a client, we retain your personal data as long as we are providing our services to you. We retain personal data after we cease providing services to you, even if you close your account, to the extent necessary to comply with our legal and regulatory obligations, and for the purpose of fraud monitoring, detection and prevention. We also retain personal data to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

Opting out of receiving electronic communications from us

If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our services.



How can you change your account personal data?

If you would like to review, correct, or update personal data that you have previously disclosed to us, you may do so by signing in to your account or by contacting us.

Your data protection rights

Depending on your location and subject to applicable law, you may have the following rights with regard to the personal data we control about you:

- the right to request confirmation of whether Azure processes personal data relating to you, and if so, to request a copy of that personal data;
- the right to request that Azure rectifies or updates your personal data that is inaccurate, incomplete or outdated;
- the right to request that Azure erases your personal data in certain circumstances provided by law;
- the right to request that we export to another company, where technically feasible, your personal data that we hold to provide our services to you.
- the right to request that Azure restricts the use of your personal data in certain circumstances, such as while Azure considers another request that you have submitted (including a request that Azure Limited make an update to your personal data);
- where the processing of your personal data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your personal data on grounds relating to your situation.

Process for exercising data protection rights

To exercise your data protection rights, you may contact us as described in the Contact Us section or via the platform if you are a client. We take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your personal data.

For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process personal data about you to provide our services, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

Access to information

You have the right to access information held about you. Your right of access can be exercised in accordance with the applicable legislation. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.



International data transfers

Azure is a global business. Therefore, your personal data may be stored and processed in any country where we have operations or where we engage service providers. We may transfer your personal data that we maintain about you to recipients in countries other than the country in which the personal data was originally collected, including to the United States. Those countries may have data protection rules that are different from those of your country. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your personal data remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Links to other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Contact

If you have any questions regarding our privacy policy, please do not hesitate to address them to info@azurepay.io