

## Data Protection and Confidentiality Policy

**Effective as of 25.05.2018**

This Data Protection and Confidentiality Policy describes how we collect, use, process, and disclose your information, including personal information, in conjunction with your access to and use of Sata Direct.

If you see an undefined term in this Data Protection and Confidentiality Policy (such as "Account" or "Card"), it has the same definition as in our Satabank General Terms and Conditions of Business or other legal documents regulating Sata Direct to all of which this Data Protection and Confidentiality Policy is inseparable part.

When this policy mentions "we," "us," or "our," it refers to the respective company, providing Sata Direct to the Client, under the above mentioned Legal Agreements, that is responsible for your information under this Data Protection and Confidentiality Policy (the "Data Controller").

For the purposes of this documents Sata Direct consists of products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by us or mobile apps, online platform, official social media platforms, or other online properties through which we provide payment and e-money services.

We give utmost importance to the protection of personal data of our customers. In the following Data Protection and Confidentiality Policy, we inform the Client about the collection, use and processing of your personal data when you apply, register or use Sata Direct and all functionalities, included in the Service, including our websites: [www.sata.bank](http://www.sata.bank), [www.sata.direct](http://www.sata.direct), our Mobile App, Bank account (current and e-money) and Cards.

For the purposes of providing online access to payment instruments, bank accounts and cards under the General Terms and Conditions of Business with Satabank p.l.c, the responsible Data Controller is Satabank p.l.c., Company number C66993, Registered office: Aragon Business Center, Dragonara Road, St. Julian, STG340, Malta. (referred to as Satabank p.l.c., Malta);

Where one of the abovementioned entities is specified as responsible Data Controller we inform you that the other entities specified above are acting as Data Processors of the Date Controller and vice-versa. The ultimate liability lies with the respective Data Controller and you should address all your questions to the respective Data Controller via the contact details specified below.

Sata Direct is designed for personal and business purposes and may be used by individuals or entities. In case you are registering for and/or using Sata Direct on behalf of an entity we will treat you as authorized person and you may be obliged to disclose to us personal data of the legal representatives, the employees, the agents, the beneficial owners or any other third-part related to the entity pursuant to the rules described below. You certify that where you have provided information regarding any third person beside yourself you have received prior consent from that other person to provide their personal information to us.

**Not a Framework Contract:** For the avoidance of doubt, this Data Protection and Confidentiality Policy does not constitute a "framework contract" for the purpose of the EU Payment Services Directive 2 (EU) 2015/2366 or any implementation of that directive in the European Union or EEA (including, without limitation any national laws implementing the EU PSD).

### 1. What information we collect

You are informed that there are three general categories of information that is collected from you differentiated on grounds as defined by the Regulation 2016/679 and other applicable data protection national laws.

#### 1.1 Information That We Collect In Order To Perform Our Legal Obligations and In Order To Provide Sata Direct As Part Of Our Contract With You

We ask for and collect from you the following personal information when you use Sata Direct.

This information is necessary for us to comply with our regulatory obligations and for the adequate performance of the contract between you and us. Without it, we may not be able to provide you effectively Sata Direct for which you register.

#### (1) Registration and Use of Account Information.

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When you sign up for Sata Direct, we require certain personal information such as:

- First name and surname
- Date of birth
- Place of birth
- Email address
- Nationality
- Registered address
- Mobile telephone number
- Identification document and all data from the identification document
- Type of identification document
- Issue date
- ID number
- Issuing authority
- CV
- Police Conduct

And other data which we may choose to collect in our enrol forms, which is necessary for your identification and verification.

## **(2) Identity Verification Information.**

In accordance with our legal obligations under the relevant Anti-money laundering and anti-terrorism financing regulations, we are obliged to verify your identity or the identity of the authorized user who is opening the Account (in case of company or other entity, referred to as "user opening the Account").

We comply with this legal obligation by means of online-based Video Identification Chat ("video call") and other procedures for verification in compliance with applicable AML laws. The Video Call is conducted by the employees of iCard AD, Bulgaria licensed as E-money institution, James Bourchier 76A, Sofia, Bulgaria or by employees of iCall EOOD, Company number 204259408, with Registered office Business Park Varna No B1, Varna, Bulgaria, which act as a sub-contractor to us for the purposes of customer support and to which you agree to provide your personal data. We shall provide a secure video channel and the necessary level of direct visual communication connection with the mobile device of the Client or user opening the Account via Mobile App. To achieve the effective execution of the Video Identification Call you or the user opening the Account must give us access to the camera of the mobile device. During the video call, in order to fully comply with the relevant Anti-money laundering and anti-terrorism financing regulations, we must take:

- photographs of the user registering for Sata Direct; and
- photographs of the principal page of your or the user opening the account's passport or of the front and rear sides of any other official ID document.

For the same purposes you or user opening the Account you might have to allow us to download and read the chip embedder in the Passport/digital copy of the Passport (referred to as ePassport) if applicable. The personal data stored in the ePassport or other official ID document will be read and encrypted via NFC technology.

## **(3) Tax information.**

In order to comply with CRS/FATCA regulations, we are required to collect your Tax Identification Number ("TIN"), Country of Tax Residence and status (active or passive business). We might be required to disclose this information to its supervising tax authorities.

## **(4) Risk and Fraud related information.**

In order to comply with relevant Anti-money laundering and anti-terrorism financing regulations we collect personal data regarding you, such as demographic data or fraud detection information, from third party service providers and/or partners, and combine it with information we have about you.

For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off Sata Direct through partnerships, or about your experiences and interactions from our

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partner and networks.

#### **(5) Source of income, annual estimate over the account, business activity details.**

In order to comply with relevant Anti-money laundering and anti-terrorism financing regulations we collect personal data regarding you related to your sources of income and any other similar financial information about you which would help us prevent money laundering and/or terrorism financing.

#### **(6) Payment Card-related information.**

We collect information about your payment cards, which we have issued to you or which are issued to you by third-party issuers and are linked to your account. The information may be as follows: address of delivery of card, card number (PAN), issue date, expiry date, IBAN or other payment account identifier to which card is linked to, currency, card transaction data, spending limits, expired cards' details, SMS or other communication which the cardholder has received or has initiated with us, card status history, date of activation, linked cards or duplicates.

#### **(7) Log data and device information.**

We automatically collect log data and device information when you access and use Sata Direct, even if you have not created an Account or logged in. That information includes, among other things: details about how you've used Sata Direct (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using Sata Direct. We collect this information in relation to our legal obligation to provide you with secure methods of controlling your financial assets and your personal data.

#### **(8) Payment Transaction Information.**

We collect information related to your payment transactions through Sata Direct for example when you make purchases from merchants, you receive money transfers, you accept card payments, we process payments executed by you, or you send money to friends and family.

The payment transaction information may include the payment instrument's details used, date and time of transactions performed by you, amount of payment transaction, payment instrument expiration date and billing postcode, email address, IBAN or other account identifier information, your address and other related transaction details.

This information is necessary for the adequate performance of the contract between you and us and to allow us to provide you effectively the e-money and payment services.

#### **(9) Participant information**

When you use Sata Direct, we collect Personal Data you provide us about the other participants associated with the transaction. Particular payment transaction information may include:

- **Send or request money:** When you send or request money through our service, we collect Personal Data such as name, postal address, e-mail, telephone number, and financial account information about the person who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
- **Add value to your accounts:** If you use any of the functionalities of Sata Direct to add value to your Account or any other account you may have, or if you ask a third party to add value to any of these accounts, we may collect personal data from you about the other party, or from the other party about you to facilitate the request. For example, if you use Sata Direct to reload a mobile phone, or to request value be added to your mobile account, we may collect Personal Data and other information including mobile account number from the other participant.
- **Money transfers to or from other Financial Institutions:** If you use any of the functionalities of Sata Direct to transfer money to accounts held with other Financial Institutions we may collect personal data from you about the other party, or from the other party about you to facilitate the payment transaction, or provide the other Financial Institutions with your Identity verification information. This is our obligation under Regulation 2015/847.

### 1.2 Information That We Collect With Your Consent

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You may choose to provide us with additional personal information in order to obtain a better user experience when using Sata Direct. This additional information will be processed based on your consent.

### **(1) Address Book Contact Information.**

You may choose to give us access to your address book contacts or enter your contacts' information manually to access certain features of Sata Direct, like sending payment requests or payment links via Sata Direct.

### **(2) Other Information.**

You may otherwise choose to provide us information when you fill in a form, conduct a search, update or add information to your Online account, respond to surveys, participate in promotions, or use other features of Sata Direct.

#### 1.3 Information We Collect from Your Use of Sata Direct.

When you use Sata Direct, we may collect information, including personal information, about the services you use and how you use them. This information is necessary given our legitimate interest in being able to provide and improve the functionalities of Sata Direct.

### **(1) Geo-location Information.**

When you use certain features of Sata Direct, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device's GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu. We may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions. The legitimate interests that we pursue with this processing is the identification of location-specific problems (i.e. coverage problems for SMS-sending purposes) and other statistical information, which helps us improve our services.

### **(2) Usage Information.**

We collect information about your interactions with Sata Direct such as your usage of any Apps or Functionalities, and other interactions with Sata Direct. The legitimate interests that we pursue with this processing is collection of crash reports and other statistical information, which helps us improve our services.

### **(3) Cookies and Similar Technologies.**

We use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. We may also allow our business partners to use these tracking technologies on Sata Direct, or engage others to track your behaviour on our behalf. While you may disable the usage of cookies through your browser settings, Sata Direct currently does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application due to lack of standardization regarding how that signal should be interpreted. For more information on our use of these technologies, see our [Cookies Policy](#).

Please be advised that when you use Sata Direct, we automatically collect some of the personal information described in the sections above such as **Geo-location Information, Log Data and Device Information, Cookies and Similar Technologies, Payment Transaction Information.**

## **2. How we use information we collect**

We use, store, and process information, including personal information, about you to provide, understand, improve, and develop Sata Direct, create and maintain a secure environment, pursue our legitimate interests and comply with our legal obligations.

### 2.1 Providing e-money and payment services.

- initiate a payment, send or request money, acceptance of card payment, funding transaction of your Account;
- authenticate your access to your Online account or your payment instrument;
- communicate with you about your Account and payment instruments;

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- communicate your personal information with third financial institution of Participants in your payment transaction;
- create an account connection between your Account and a third-party account or platform, if applicable;
- perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes
- Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking Sata Direct or by applying other fraud prevention measures.
- Conduct security investigations and risk assessments.
- Conduct checks against databases and other information sources.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce the our rights, interests and claims arising from the Legal Agreements.

We process this information given our legitimate interest in improving Sata Direct and our clients' experience with it, and where it is necessary for the adequate performance of the contract with you as well as to comply with applicable laws.

## 2.2 Provide, Improve, and Develop Sata Direct.

- Enable you to access and use Sata Direct.
- Accept, process and administer online orders for payment cards;
- Process purchase payments, issue invoices and or other kind of payment documents for the processed order;
- To organize shipment of ordered payment cards;
- Operate, protect, improve, and optimize Sata Direct and your experience, such as by performing analytics and conducting research.
- Provide customer service.
- Send you service or support messages, updates, security alerts, and account notifications.
- If you provide us with your contacts' information, we may process this information: (i) to facilitate your payment transactions, (ii) process your requests, (iii) for fraud detection and prevention, and (iv) for any purpose you authorize at the time of collection.
- To operate, protect, improve, and optimize Sata Direct and experience, and personalize, customize your experience, introduce you to our other Services, we conduct profiling based on your interactions with Sata Direct.

We process this information given our legitimate interest in improving Sata Direct, and where it is necessary for the adequate performance of the contract with you.

## 2.3 Create and Maintain a Secure Environment.

- Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity.
- Conduct security investigations and risk assessments.
- Generate one-time permission (OTP) codes for access to your Online account and for execution of payment transaction.
- Verify or authenticate information or identifications provided by you.
- Conduct checks against databases and other information third party sources, including background or police checks, data providers, credit bureaus to the extent permitted by applicable laws and with your consent where required.
- Monitor your payment transactions
- Resolve any disputes between you and any of our clients and other users and enforce our agreements with third parties.
- Enforce our legal rights.

We process this information given our legitimate interest in protecting Sata Direct, to measure the adequate performance of our contract with you, and to comply with applicable laws.

## 2.4 Provide, Personalize, Measure, and Improve our Advertising and Marketing.

- Send you promotional messages, marketing, advertising, and other information related to Sata Direct and the products and services of unaffiliated businesses that may be of interest to you based on your preferences and social media advertising through social media platforms such as Facebook, LinkedIn or Google.
- To provide personalised services offered by us on third-party websites and online services. We may use your Personal Data and other information collected in accordance with this Data Protection and Confidentiality Policy to provide a targeted display, feature or offer to you on third-party websites. We may use cookies and other tracking technologies to

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provide these online services and/or work with other third-parties such as advertising or analytics companies to provide these online services.

- To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information through the Services. We will use this information to enhance the security of the Sata Direct and provide you with location-based Service, such as advertising, search results, and other personalised content.
- To make it easier for you to find and connect with others, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.
- Personalize, measure, and improve our advertising.
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by us or its third-party partners.
- For participation in games, quizzes and completion of questionnaire or a contest entry form for promotional campaigns.
- Conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with Sata Direct, information obtained from third parties) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you.

We will process your personal information for the purposes listed in this section given your consent in undertaking marketing activities to offer you products or services that may be of your interest. You have the right to opt-out from processing your personal information for the purposes described above by withdrawing your consent at any time and free of charge.

### 3. With whom do we share personal data

#### 3.1 With other members of the corporate family of Satabank:

We may share your Personal Data with members of the Satabank Group of companies or within our extended family of companies that are related by common ownership or control, so that we may provide the Services you have requested or authorised or to manage the risk, or to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements and to help us manage the availability and connectivity of Sata Direct and communications.

#### 3.2 With third part service providers:

We may share personal information with third party service providers that support us in providing Sata Direct, products and/or services with functions at our decision and our behalf.

These third-party service providers may for example:

- verify your identity or authenticate your identification documents,
- facilitating technically the Video Call and/or store the Video Call recording;
- check information against public databases,
- conduct background or police checks, fraud prevention, and risk assessment,
- perform risk monitoring;
- perform product development, maintenance and debugging,
- allow the provision of Sata Direct through third party platforms and software tools (e.g. through the integration with our APIs), or
- provide customer support,
- IT support and development services;
- card plastic production services;
- resell and distribute other products provided by Sata Direct;
- provide technical support for products provided by Sata Direct;
- promote Sata Direct as business introducers, distributors, promoters, sales agents or similar;
- perform courier services on our behalf;
- provide cloud, storage or collocations services;
- provide audit and accountancy services;

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- provide legal, compliance or other consultancy services;
- Marketing and Public Relations services

These providers have limited access only to your information necessary to perform the tasks for which they were contracted for on our behalf and are contractually bound to protect and to use it only for the purposes for which it was disclosed and consistent with this Data Protection and Confidentiality Policy.

3.3 With other financial institutions that we have contracted to enable us to provide effectively Sata Direct to our customers:

These financial institutions may only use this information in order for us to provide you with the wider scope of payment features. Such may be:

- Correspondent banks for the purposes of settling money transfers and currency exchange operations;
- Domestic payment schemes for the purposes of processing domestic payments;
- International payment schemes for the purposes of processing euro payments;
- Card Organizations for the purposes of card issuing and acquiring;
- Financial Institutions

3.4 With the other parties to transactions when you use Sata Direct, such as other Clients, merchants, and their service providers:

We may share information with the other participants to your transactions, including other clients or payers/payees you are sending or receiving funds from, and merchants or their service providers when you use Sata Direct to pay for goods or services. The information includes:

- Personal Data necessary to facilitate the transaction;
- Personal Data to help other participant(s) resolve disputes and detect and prevent fraud; and

3.5 With other third parties for our legitimate interest or as permitted or required by law:

We may share information about you with other parties for our legitimate interest or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to us or our corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- with credit agencies and data processors for credit reference checks and anti-fraud and compliance purposes;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to facilitate a purchase or sale of all or part of our business;
- in connection with shipping and related services for purchases made using a Service;
- in relation to promoting Sata Direct to end users by third party business introducers;
- to help assess and manage risk and prevent fraud against us, our clients and fraud involving our websites, mobile apps or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals, and merchants;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants;
- to credit reporting and collection agencies;
- to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

#### **With your consent:**

We also will share your Personal Data and other information with your consent or direction, including if you authorise an account connection with a third-party account or platform.

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**In addition, we may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why users visit our website and services. This data will not personally identify you or provide information about your use of Sata Direct. We do not share your Personal Data with third parties for their marketing purposes without your consent.**

### 3.6 Aggregated Data.

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

### 3.7 Monitoring

We may monitor or record telephone calls, emails, web chat or other communications with you for regulatory, security, customer services or training purposes. When visiting our offices, CCTV, access control systems and/or other monitoring systems may be in operation.

### 3.8 Social Media

We may review and use public comments and opinions made on social networking sites (e.g. Facebook Twitter, Google +, LinkedIn, Youtube, etc.) to better understand our customers and our provision and development of Sata Direct.

### 3.9 Business Transfers.

If Satabank or any other company that might be involved in providing Sata Direct is involved in any merger, acquisition, reorganization, sale of assets, transfer of portfolio, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred to a different legal person and/or becomes subject to a different privacy policy.

### 3.10 Customer Authentication

We may share your personal information with LeuPay Ltd., Company number 10785565, with Registered office 20 Kentish Town Road, London, England, NW1 9NX, UK and iCard AD, Bulgaria, in relation to the customer two-factor authentication, required under the PSD2 laws, via technical tool Gate Keeper - mobile application that facilitates the strong customer authentication.

## 4. Your rights

You may exercise any of the rights described in this section before the respective Data Controller pursuant to the Legal Agreements by sending an email from your e-mail registered for Sata Direct to the respective Company providing the Service to you under the respective Legal Agreement stated below. Please note that we may ask you to verify your identity before taking further action on your request. Please note that upon receipt of your e-mail we shall try our best to provide you with the requested information and resolve your request in reasonable time, subject to all obligations which we or the related companies have under the applicable laws.

### 4.1 Managing Your Information.

You have the right to obtain the following:

- confirmation of whether, and where we are processing your personal data;
- information about the purposes of the processing;
- information about the categories of data being processed;
- information about the categories of recipients with whom the data may be shared;
- information about the period for which the data will be stored (or the criteria used to determine that period);
- information about the existence of the rights to erasure, to rectification, to restriction of processing and to object to processing;

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- information about the existence of the right to complain to any Regulator;
- where the data was not collected from you, information as to the source of the data; and information about the existence of, and an explanation of the logic involved in, any automated processing.
- Additionally, you may request a copy of the personal data being processed.

#### 4.2 Rectification of Inaccurate or Incomplete Information.

You have the right to ask us to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself via your online access to your Online account).

#### 4.3 Data Access and Portability.

You have the right to:

- receive a copy of your personal data in a structured, commonly used, machine-readable format that supports re-use;
- transfer your personal data from one controller to another;
- store your personal data for further personal use on a private device; and
- have your personal data transmitted directly between controllers without hindrance.

In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us.

#### 4.4 Data Retention and Erasure.

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our regulatory obligations. If you no longer want us to use your information to provide Sata Direct to you, you can request that we erase your personal information and close your Account, providing your Account is in good standing, not blocked or somehow limited for compliance, risk or regulatory reasons, or due to your outstanding obligation to us, court order, pledge or order by another regulator or other reason which prevent us by law to close your account or terminate the Service. In case the Data Controller is a regulated financial institution, such as credit institution, e-money institution or similar, such Data Controller is obliged under PSD and AML laws to keep your personal information and all transactions history for a period of 5 (five) years after the termination of the relation with you. Please note that if you request the erasure of your personal information:

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing security. For example, if we suspend your Account for fraud or safety reasons, we may retain certain information from that Account to prevent that client from opening a new Account in the future. We are also obliged to retain personal data which we have collected for the purposes of complying with the relevant anti-money laundering and anti-terrorism financing for a period as defined under the applicable law.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, Sata Direct may keep some of your information for tax, legal reporting and auditing obligations.
- Because we maintain Sata Direct to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

#### 4.5 Withdrawing Consent and Restriction of Processing.

Where you have provided your consent to the processing of your personal information by us you may withdraw your consent at any time by changing your Online account settings or by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

#### 4.6 Objection to Processing.

In some jurisdictions, applicable law may entitle you to require us not to process your personal information for certain specific

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#### Satabank P.L.C.

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St Julians STJ 3140, Malta,  
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t: +356 2247 7900  
f: +356 2247 7922  
e: [info@sata.bank](mailto:info@sata.bank)  
[www.sata.bank](http://www.sata.bank)

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purposes (including profiling for marketing purposes) where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims. Please note that Data Controllers which are regulated financial institutions, such as credit institutions, e-money institutions or similar are obliged under AML laws to make risk profiling of their customers upon opening of the relationship and constantly during the relationship and this is a legitimate reason. In case you do not wish us to process your personal data for certain specific purposes, which are legitimate purposes to us, you shall have to close your account or we may have to stop providing you some or all of the Services, subject to all conditions for the closing of the account, specified above in this Section.

Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes by sending an e-mail to the contact e-mails below.

#### 4.7 Lodging Complaints.

4.7.1 You should in first place try to resolve the matter by sending an e-mail to the respective Data Controller under this Data Protection and Confidentiality Policy from your registered e-mail for the Service:

Where the responsible Data Controller (as outlined in the introduction of the Privacy Policy) is specified to be Satabank p.l.c., Malta, you may contact us at:

Data Protection Officer (DPO):

gdpr@sata.bank

Satabank p.l.c.

Aragon Business Center, Dragonara Road, St. Julian, STG340, Malta

4.7.2 Competent Regulator. In case you are not satisfied with the reply or resolution of the respective Data Controller, you have the right to lodge complaints about the data processing activities carried out by us before the competent data protection supervisory authorities as described below.

If the Data Controller responsible for the respective data processing, subject to your complaint, is Satabank plc, Malta you have the right to file a complaint with its lead supervisory authority, the Information and Data Protection Commissioner:

Address:

Level 2, Airways House

High Street

Sliema SLM 1549

Malta

Tel: +356 23 28 7100

e-mail: idpc.info@idpc.org.mt

## 5. Operating globally

To facilitate our global operations, we may be required to transfer, store, and process your information within our family of companies or with service providers based in Europe, India, Asia Pacific and North and South America. Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Data Protection and Confidentiality Policy. Where we transfer store and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

## 6. International transfers

### 6.1 EU-US & Swiss-US Privacy Shield.

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Where we disclose any of your collected personal information outside EEA to USA (if applicable), we shall comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework and any other adequacy decision.

## 6.2 Other Means to Ensure an Adequate Level of Data Protection.

In case personal information is shared with corporate affiliates or third-party service providers outside the EEA in absence of an adequacy decision, we have - prior to sharing your information with such corporate affiliate or third-party service provider - established the necessary means to ensure an adequate level of data protection. We will provide further information on the means to ensure an adequate level of data protection on request.

## 7. Security

We take the responsibility to ensure that your personal information is secure, kept in an encrypted form on servers, collocated in Special data centres in Class A jurisdictions in Europe. To prevent unauthorized access or disclosure of information we maintain physical, electronic and procedural safeguards that comply with applicable regulations to guard non-public personal information. Once you are logged into your Online account, all internet communication is secured using Secure Socket Layer (SSL) technology with High-grade security Encryption (AES-256, 256bit keys, certified by StartCom Ltd). We restrict access to your personally identifiable information only to employees who need to know that information in order to provide products or services to you.

If you know or have reason to believe that the credentials of your Online account have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Account, please contact us following the instructions in the Contact Us section below. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Online account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current.

## 8. Can Children Use Our Services?

Sata Direct is not designed to individuals under the age of 18. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use Sata Direct. If we obtain actual knowledge that we have collected Personal Data from an individual under the age of 18, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from an individual under the age of 18.

## 9. Changes to this Data Protection and Confidentiality Policy

We reserve the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Data Protection and Confidentiality Policy, we will post the revised Data Protection and Confidentiality Policy on the Website for the Service. If you disagree with the revised Data Protection and Confidentiality Policy, you may cancel your Account. If you do not cancel your Account before the date the revised Data Protection and Confidentiality Policy becomes effective, your continued access to or use of Sata Direct will be subject to the revised Data Protection and Confidentiality Policy.

## 10. Contact us

If you have any questions or complaints about this Data Protection and Confidentiality Policy or our information handling practices, you may email us from your Client's email for the Services to the e-mails stated above in **Section 4**.

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