

UAB "Iban Online"

Privacy and Data Policy

(the Policy)

Governance	
Version	V2.0
Approved by	Marc-Anthony Hurr The Managing Director
Policy Owner	UAB "Iban Online" Company Code: 305638426 Registered Address: Didžioji g. 18, LT-01128 Vilnius, Lithuania (the Company)
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Introduction

Welcome to the Privacy Policy of UAB "Iban Online" (hereinafter – the **Policy**). The Company respects your privacy and is committed to protecting your personal data. This Policy will inform you as to how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you. Please also use the Glossary to understand the meaning of some of the terms used in this Policy.

1. Important information and who we are

Purpose of this privacy policy

This Policy aims at giving you information on how the Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Policy together with any other terms or policies we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements other notices and privacy policies and is not intended to override them.

Controller

The Company is the controller and responsible for your personal data (collectively referred to as the **Company, we, us** or **our** in this Policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this Policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: UAB "Iban Online"

Email address: contact@ibanonline.lt

Postal and registered address: Didžioji g. 18, LT-01128 Vilnius, Lithuania

Telephone number: +37052228888

You have the right to make a complaint at any time to the IDPS (<https://edps.europa.eu/>). We would, however, appreciate the chance to deal with your concerns before you approach any third parties.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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 Policy of every website you visit.

2. The data we collect about you

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes current and previous postal addresses, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not

considered personal data in law as this data will 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 Policy.

We may need to collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Occasionally we may need to collect information about criminal convictions and offences. We may, in certain circumstances, require the explicit consent of the data subject. Should such a need arise we will contact you. In such cases we will apply enhanced security measures to ensure that the privacy of the data is maintained and will only process it in accordance with the purposes as set out in Clause 4 below.

If you fail to provide personal data

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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

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

Direct interactions. You may give us your Identity, Contact, Employment, Financial and Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a survey; or
- give us feedback or contact us.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - a. analytics providers such as Google based outside the EU;
 - b. advertising networks; and

- c. search information providers based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical and payment services.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources
- Identity, Contact, Credit and Employment Data from financial advisors, credit reference and fraud prevention agencies.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- 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;
- where we need to comply with a legal obligation.

To find out more about the types of lawful basis that we will rely on to process your personal data, please see Clause 12, Glossary.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

<p>To provide our products and services including:</p> <ul style="list-style-type: none"> (a) Manage payments, fees and charges (b) Seek to prevent criminal activity, fraud and money laundering 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Employment (d) Financial (e) Transaction (f) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us, to comply with our legal obligations)
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Employment (d) Profile (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical 	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> (a) Technical (b) Usage 	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>

<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Credit (c) Employment (d) Technical (e) Usage (f) Profile (g) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Credit, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time by email at contact@ibanonline.it.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some

parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see Cookie Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Fraud prevention agencies

We carry out credit and identity checks when you apply for some of our products or services. In order to do this, we will obtain personal information about you from fraud prevention agencies (**FPAs**). This will enable us to assess whether we can enter into a contract with you. In particular, this will enable us to:

- verify the accuracy of the information you provided;
- manage your account;
- meet our legal obligations to prevent criminal activity, fraud and money laundering.

From time to time we will also share some of your personal information with FPAs. If you provide us with false or inaccurate information or if we suspect or identify fraud we may share your personal information with FPAs.

7. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

8. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We may use systems to make automated decisions using the personal information we have obtained. This leads to quicker For example, we may automatically decide whether there is a risk of fraud or money laundering. This is necessary for entering into or performance of a contract with us.

In some circumstances you can ask us to apply human intervention: see your legal rights below for further information.

9. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 unauthorised use 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 the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Employment, Financial and Transaction Data) for 10 years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise 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.

11. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data. This includes the right to know about the processing of data and to have access to such data.
- Request correction of your personal data. This includes the right to rectify inaccurate personal data or, in the light of the purposes of the processing of personal data, to have incomplete personal data completed.
- Request erasure of your personal data or to restrict processing activities of such data (with the exception of storage).
- Object to processing of your personal data.
- Request restriction of processing your personal data for one of the legitimate reasons.
- Request transfer/transfer of your personal data (the right to portability of the data you have provided to us).
- Right to withdraw consent.
- Right to obtain human intervention.

If you wish to exercise any of the rights set out above, please contact us using the contact details set out in Clause 1.

No fee usually required

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 could refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

Application procedure

Please be informed that when applying to us for the execution of the rights listed above, kindly please fill-in the relevant form and provide the information requested therein.

Kindly please submit the form by us by e-mail: contact@ibanonline.it.

Please also attach a copy of your personal identification document to the form so that we can verify your identity.

We will give you a response within 1 month from the receipt of your application. Please be informed that, depending on the scope and complexity of your request, this deadline may be extended to 2 months. In any case, you will receive a response about the actions we have taken on your request within 1 month. We will communicate with you in the form of communication you choose, which you will specify in the form.

We will provide you with a response free of charge once a year. If you would like to receive more responses, we may charge you additional fees or opt out of your request.

If we have a reasonable doubts about your identity, we may ask you additional information to verify it.

12. Glossary

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use 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 to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Third Parties

External Third Parties

- Service providers acting as processors based who provide IT and system administration services.
- Professional advisers, acting as processors or joint controllers including lawyers, bankers, auditors and insurers, who provide consultancy, banking, legal, insurance and accounting services.
- Authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Fraud prevention agencies and credit reference agencies acting as processors or joint controllers.

Your legal rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.

- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. 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. We will advise you if this is the case at the time you withdraw your consent.

Obtain human intervention where we have taken a decision based solely on automated processing. This enables you to obtain human intervention on our part, express your point of view and to contest the decision.

Annexes

*Annex No. 1 to the Privacy and Data Policy
of UAB "Iban Online"*

DATA SUBJECT ACCESS REQUEST

(date)

Data subject:

(please enter your details)

Name	
Surname	
Telephone number	
E-mail address	
Date of birth	

I would like to access the following data being processed:

(please tick all that apply)

Identity data	<input type="checkbox"/>
Contact details	<input type="checkbox"/>
User recognition information	<input type="checkbox"/>
Creditworthiness data	<input type="checkbox"/>
Other	<input type="checkbox"/>

I would like to receive the reply:

by registered mail to _____.

by e-mail to _____.

I would like to receive the reply:

in the English language

in the Lithuanian language

Please remember to attach a copy of your personal document.

Annexes to the form:

1.

2. Power of attorney/representation contract/etc. (in cases where a complaint is submitted through representative)

(signature)

(name, surname)

UAB "Iban Online"

Cookie Policy

(the Policy)

Governance	
Version	V2.0
Approved by	Marc-Anthony Hurr The Managing Director
Policy Owner	UAB "Iban Online" Company Code: 305638426 Registered Address: Didžioji g. 18, LT-01128 Vilnius, Lithuania (the Company)
Date Last Reviewed	20.10.2021
Review Frequency	Standard: once a year and during a reasonable time period after amendments of the applicable legislation
Next Review Date	30.06.2022

Information about our use of cookies

We collect data about how you interact with our website through the use of cookies. Our website uses cookies to distinguish you from other users of our website. By continuing to browse our website, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Name	Purpose	Own/Third Party	Additional information
_ga	Analytics	Third party (Google Analytics)	Used to differentiate users
_gat	Analytics	Third party (Google Analytics)	Limit number of requests
_gid	Analytics	Third party (Google Analytics)	Used to differentiate users
ibanonline_	Internal	Own	Cookie policy acceptance
UserFrosting	Auth/Session token	Own	Identify all the requests belonging to a same session
1P_JAR	Analytics	Third party (Google Analytics)	Set a unique ID to access gsuite services
_cfduid	Internal	Third party	Needed by jQuery

		(jQuery)	
_cfduid	Security	Third party (Cloudflare)	Identify individual clients, remember user settings
_biz_flasgA	Security	Third party (Cloudflare)	Identify individual clients, remember user settings
_biz_nA	Security	Third party (Cloudflare)	Identify individual clients, remember user settings
_biz_pendingA	Security	Third party (Cloudflare)	Identify individual clients, remember user settings
_biz_uid	Security	Third party (Cloudflare)	Identify individual clients, remember user settings
_mkto_trk	Security	Third party (Cloudflare)	Identify individual clients, remember user settings

Third parties

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

How do I change my cookie settings?

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

You can find out more information about cookies at www.allaboutcookies.org or www.aboutcookies.org.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.