

How we handle your data

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Introduction

UAB ECREDO (hereinafter “**eCREDO**”) welcomes you to our website (hereinafter the “Site”). **eCREDO**, through the **eCREDO Prepaid Mastercard**, offers you a prepaid master card, which is issued by Prepaid Financial Service (hereinafter “PFS”). Therefore, in this privacy policy (“Privacy Policy”), the expressions “we” and “us” means **eCREDO**. This Privacy Statement describes how we collect, use, process and disclose certain personal information.

Who we are?

UAB ECREDO, is a limited liability company incorporated by the State Enterprise Center of Registers in Lithuania under the given registration number 305118895 and their registered offices are at J. Basanavičiaus g. 26, LT-03244 Vilnius, Lithuania (hereinafter “**eCREDO**”). It was incorporated in 2019, having as main activities in the aspects of the financial industry.

eCREDO is a growing Fintech provider of digital financial services - which offers privacy and a new way to connect with their money. With all **eCREDO** accounts customers can benefit from a free International Bank Account Number (IBAN) for incoming and outgoing transfers, as well as a physical prepaid Mastercard.



The Company respects your privacy and is committed to protect your personal data through its compliance applicable privacy and data protection regulation (GDPR). Therefore, please read carefully the above privacy policy for your information and please do not hesitate to contact us for any further clarification you might have.

How we collect/ obtain information?

- Directly from you and/or
- Through third parties
- Through this website

Categories of Personal Information we collect:

- information you provide to the company by filling in the forms we initially requested from you
- information you provide to the company when you submit your consent or when you report a problem through the Website
- information provided by you (including email addresses) in case you contact us

Personal Information we collect:

- We will collect personal information about you which you provide to us when using the Site, for example, when you activate your **eCREDO Prepaid Mastercard**, when you log in to manage your **eCREDO Prepaid Mastercard**, contact us through the Site, when you request information or otherwise provide personal information to us. Such information may include (but is not limited to) the following information and/or Data:
 - your Prepaid Card number and PIN
 - your full name
 - contact details such as address, telephone number and email address
 - date of birth
 - proof of identity documents
 - proof of address documents
 - transactional information

Please be noted that you must ensure that the personal information you provide to us is accurate and complete.

Purpose of the processes and/or use of your Personal Information:

- We collect, use, store and process personal information about you for the following purposes:
 - (i) to enable you to access and use the Site;
 - (ii) to run your Account Prepaid Mastercard account;



- (iii) to process your fund transfers and transactions;
 - (iv) to enable us to provide any services which you have requested through use of the Site;
 - (v) to personalise aspects of our overall service to you;
 - (vi) to provide you with information regarding products and services that you might be interested (see the “Marketing” section below);
 - to provide you with account services as per our contractual obligations;
 - (viii) to comply with our legal obligations for the prevention of fraud, money laundering, counter terrorist financing or misuse of services,
 - verifying your identity, contacting you regarding our services to you;
 - (ix) where requested by law enforcement for investigation of crime.
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- compliance- in order to comply with our legal obligations

Data Sharing:

We will not disclose personal information obtained from you to any third parties. However, we may share Personal Information with our affiliates for the purpose of responding to your requests or otherwise as necessary for the purposes described above:

- in connection with legal proceedings or potential legal proceedings
- where is required to do so by law or any other Governmental or law enforcement agency (including but not limited to **eCREDO Prepaid Mastercard** our issuing banks, our processors and our third-party partners.)
- in accordance for Anti-Money Laundering and Fraud prevention checks and in order to comply with AML Regulations.
- if you breach this Privacy Policy and/or our Terms of Use

List of recipients we might disclose information

- A. **Affiliate companies – service providers**
- B. **Third parties** such as authorities, agents and administrative personnel in various countries (Tax Authorities, Bank Institutions etc.)
- C. **Legal Successors**- we might disclose personal information to a buyer or a successor in the event of merger, divestiture, restructuring, reorganization, dissolution or sale or transfer of some or all of our assets
- D. **Transfer of the data in countries out of the European Economic Area**
Unless you have specifically consented to the transfer, we will only transfer personal data outside the European Economic Area (EEA) as described to the paragraph below.

Transferring your information outside EEA

We may store, process and/or transfer the personal information you submit to us through use of the Site to countries outside of the European Economic Area including (without limitation) to the USA. Personal data transferred outside of the EEA will be stored and



processed by affiliate companies or services provides, or representative offices for business and management purposes, to perform a contractual obligation owed by us to you and/or to provide you with information or services that you have requested. By using this Site, you consent to us transferring your personal information to countries outside the EEA for our legitimate business purposes as outlined in this paragraph. We will take appropriate steps to protect your personal data.

Personal data shall not be transferred to a country or territory outside the European Economic Area where:

- we transfer the data to a country or international organisation which the EU Commission has decided to ensure an adequate level of protection for your personal data;
- the transfer of your personal data is subject to adequate safeguards, which may include binding corporate rules or standard data protection clauses adopted by the EU Commission; or
- one of the derogations in the GDPR to transfer personal data outside the EEA applies.

Marketing

We and/or our partners will only use the personal information obtained from you to enable us to provide you with the customer support including any notice, for example changes about any product and/ or service we offer, advertising - in case you have provided us with your consent, we may communicate with you in order to inform you about services and/or products offered by us or other third parties for which you might be interested .

You will be receiving advertising material from **eCREDO**, only if you have provided your explicit consent. In case you feel that you need to revoke this consent, you will be provided with an automated way to opt-out (unsubscribe) from all marketing e-mails sent by **eCREDO**. Please follow the instructions from the e-mail you received to do so. In the unlikely case you receive unwanted e-mail from our Company, please forward a copy of that e-mail to dpo@ecredo.com.

Individual's Rights

You, as Individual, have the following rights:

1. **Right of access** - request access to any personal data we hold about you;
2. **Right of rectification** -have any personal data which we hold about you which is inaccurate or incomplete rectified;
3. **Right to be forgotten** - have personal data erased;
4. **Right to restriction of processing** - have the processing of your personal data restricted;
5. **Right of portability** – To be provided with the personal data that you have supplied to us in a portable format that can be transmitted to another organisation without hindrance;

6. **Right to object** - object to certain types of processing, including processing based on legitimate interests, automated processing (which includes profiling) and processing for direct marketing purposes; and
7. **Right to object to automated processing, including profiling** -not be subject to a decision that is based solely on automated processing which produces a legal effect or which has a similar significant effect for the individual.

If you wish to exercise any of the rights set out above, you must make the request in writing to the Data Protection Officer, for whom all details are described above. Please note some of these rights are restricted in some circumstances.

If you have provided your consent to any of the processing of your personal data, you have the right to withdraw your consent to that processing at any time, where relevant. You must contact the Data Protection Officer if you wish to do so.

If you object to processing based on legitimate interests, we must no longer process that personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or that the processing is required for the establishment, exercise or defence of legal claims.

Security of Personal Information:

eCREDO takes appropriate security measures to ensure the protection of the Personal Information from any unauthorised access or disclosure. In addition, all employees had been trained on how to use, handle and process personal data, according to the provisions of Personal Data Law. Furthermore, **eCREDO** has upgraded technical measures and has transformed the policies and procedures in order to comply with the General Data Protection Regulation.

Access and Correction

If you wish to access or update the Personal Information you submitted at **eCREDO** website, or to make any inquiries about the processing of your information, please contact us. We provide individuals with access to their Personal Information as required by applicable data protection and privacy laws.

Links

This website contains links to other sites. Please be aware that we are not responsible for the privacy practices of such other sites. This privacy policy applies solely to information collected by this Site.

Cookies

Cookies are small files on your computer, which can store information that you transmit when accessing the internet. They are transmitted via the web browser to the computer's hard drive. Cookies cannot transmit any information from a computer system. They instead help to make a return visit to the Site as simple and user friendly as possible. Some cookies



remain on the computer's hard drive so your computer gets recognised on your next visit. You can change your browser options at any time to deactivate cookies. (Some functions are only accessible when cookies are enabled and we therefore recommend [allowing cookies.](#))

Data Protection Officer

eCREDO has assigned ARETI CHARIDEMOU & ASSOCIATES L.L.C as the personal Protection Agent.

Arete Charidemou & Associates LLC - Law Firm

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Updates to Privacy Policy

eCREDO reserves the right to change this Privacy Policy from time to time. Please check the Privacy Policy frequently and particularly before you submit additional personal information via the Website. All revisions of this Privacy Policy will be posted on the web site via a link from the homepage. We also display the effective date of the Privacy Statement on the top of this page.

How you can petition for complaints

It is very important the principles of privacy to be followed and we should take all the appropriate measures to avoid any breach or loss of these data.

We ensure that the personal data you disclosed to us, are saved in a platform which is protected with additional security factors.

Any breach of the GDPR and/or other relevant Data Protection Acts will be taken seriously and if you consider that the data protection principles have not been followed in respect of personal data about yourself or others you have the right to lodge a complaint with the relevant data protection supervisory authority.

Our Protection Supervisory Authority is the Personal Data Protection Bureau (Independent Supervisory Authority for the Protection of Individuals). If you have any issues with our processing of your personal data and would like to make a complaint, you may contact the Personal Data Protection Bureau on (+357) 22 818 456 or at 1 Iasonos, 1082 Nicosia, Cyprus.



Contact

If you require this Privacy Policy to be provided to you in paper form and/ or you need any further clarification, please contact our Data Protection Officer, at dpo@ecredo.com or via phone on (+357) 25 508 219.