



Privacy Policy

We, Tranzzo LTD (<https://tranzzo.com>), being a legal entity registered under the laws of England and Wales, registration number is 11075606, with its registration address 91 Battersea Park Road, London, England, SW8 4DU, and from time to time, its subsidiaries and partners (together the “Group”) and each being “member of the Group”, “we”, “us” for the purposes of this Privacy Policy are "data controller" of your personal information and “processor” of certain personal information, as described in more details in this Privacy Policy, recognize our responsibilities in relation to the collection, holding, processing, use and/or transfer of personal data under the General Data Protection Regulation (hereinafter “GDPR”). Personal data will be collected only for lawful and relevant purposes and all practicable steps will be taken to ensure that personal data held by us is accurate. We will use your personal data which we may from time to time collect in accordance with this Privacy Policy.

We regularly review this Privacy Policy and may from time to time revise it or add specific instructions, policies and terms. Where any changes to this Privacy Policy are material, we will notify you using the contact details you have provided us with and, where required by law, we will give you the opportunity to opt out of these changes by means notified to you at that time Tranzzo's contact details are as follows:

Post: 91 Battersea Park Road, London,
England, SW8 4DU
Email: gdpr@tranzzo.com
Telephone: +44 203 868 31 67.

Legal basis

We need to collect certain types of information for compliance with legal requirements relating to our anti-fraud / anti-money laundering / know your customer obligations under EU laws and laws of the United Kingdom and Wales. If this information is not provided we cannot agree to provide a service to you. Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defense of legal claims. We will not delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

Data collection and storage

This Privacy Policy describes how we use your personal information when you use our website(s) or your business supplies services or products to us or we provide services to your business.

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We will collect, store and use your personal information to allow access to this website, register our customers, and provide our services and for the purposes set out in more detail below.

What information we collect	How we use your data
<p>Your contact details including:</p> <ul style="list-style-type: none"> - your name, address, email address, and telephone number(s); - your identification details, including your date of birth, gender, country of residence. 	<p>We use this information to:</p> <ul style="list-style-type: none"> - process your application or registration request; - on-board you as a customer; - provide our products and services; - manage and administer our services including your account with us; - communicate with you about your account and our services, including informing you of changes to our fees and our terms and conditions related to our services.
<p>Know Your Client (hereinafter “KYC”) information including:</p> <ul style="list-style-type: none"> -passport or other government-issued identity document; -your photo(s); -documents establishing your source of funds; -results of KYC or Politically Exposed Person (PEP) checks; -where this is personal information (for example your turnover, type of activity). 	<p>We use this information to:</p> <ul style="list-style-type: none"> - carry out regulatory checks and meet our obligations to our regulators; - help us ensure that our customers are genuine and to prevent and detect fraud, money laundering and other crime (such as terrorist financing and offences involving identity theft).
<p>Information you provide as part of your account with us:</p> <ul style="list-style-type: none"> - your password; - our account and marketing preferences. 	<p>We use this information to:</p> <ul style="list-style-type: none"> - provide our services to you; - manage and administer your account with us; - communicate with you regarding your account and our services.
<p>If you are our Client:</p> <ul style="list-style-type: none"> - your transactions using your accounts with us, including your bank account and payment card details, the amount, currency, originator or beneficiary, and time/date of the payments you make and receive; - information about the digital device through which you access our services, such as device type, operating system, screen resolution, unique device identifiers, the mobile network system; - IP address; - date and time of log-in and requests; - information in your correspondence with 	<p>We use this information to:</p> <ul style="list-style-type: none"> - provide our services to you; - manage and administer our services and systems; - check if you are in a location or using a device consistent with our records in order to help prevent fraud; - develop and improve our services based on analyzing provided information and technical capabilities of our users; - improve our services to better technical capabilities of the users of our service; - answer any queries or concerns; - monitor customer communications for

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<p>us, by email, telephone, messaging, texts, on-line chats, via social media, or otherwise;</p> <ul style="list-style-type: none"> - whether you've clicked on links in electronic communications from us, including the URL clickstream to our website; - information that you provide in response to our surveys. 	<p>quality and training purposes.</p>
<p>If you are not our Client:</p> <ul style="list-style-type: none"> - device information such as operating system, unique device identifiers, the mobile network system; - hardware and browser settings; - date and time of visits; - the pages you visit, the length of the visit, your interactions with the page (such as scrolling, clicks and mouse-overs), methods to browse away from our website, and search engine terms you use; - IP address. 	<p>We use this information to:</p> <ul style="list-style-type: none"> - develop new services based on the information being collected, the behavior of our users and the technical capabilities of our users; - identify issues with the website, including website security, and user's experience of it; - monitor the way our website is used (including locations it is accessed from, devices it is accessed from, understanding peak usage times and analyzing what functionality and information is most and least accessed). where our customers have come from online (such as from links on other websites or advertising banners), and the way in which our website is used by different users groups; - do statistical analysis and research with the purpose of better understanding the breakdown of our customers, their use of our services, and what attracts our customers to our services.
<p>Special information that you give us or that we receive when using our services:</p> <ul style="list-style-type: none"> - information revealing your religious, political or philosophical beliefs revealed, or relating to offences (or alleged offences), which might be revealed by KYC (for example, because it has been reported in the press); - information revealing your religious, political or philosophical beliefs, or your ethnic background, or about your health, trade union membership or sex life or sexual orientation, implied by your payment transactions that we perform in providing our services. 	<p>We use this information to:</p> <ul style="list-style-type: none"> - comply with our regulatory obligations to conduct KYC which may sometimes reveal this special information; - provide you with our services.
<p>Information that we collect from individuals representing organizations such as our corporate customers and suppliers,</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> - build relationships with other organizations;

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<p>including: - names, roles, and contact details of individuals working for organizations; - other personal information regarding such individuals; any personal information contained in correspondence with those individuals.</p>	<ul style="list-style-type: none"> - provide marketing communications to these individuals; - improve our services and develop new services based on the preferences of individuals; - obtain services for our business.
<p>Information that we collect from individuals representing organizations in connection with our promotional or marketing activities, including: - names, roles and contact details of individuals working for organizations; - information provided in response to our surveys; and other personal information regarding such individuals.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> - build relationships with other organizations; - provide marketing communications to these individuals; - do statistical analysis and research with the purpose of better understanding our potential market, trends in the information provided and what attracts our customers to our services; - publish the results of the surveys on an anonymized basis; - improve our services and develop new services based on the preferences of individuals

How long do we keep your information

We will keep customer and account application information for the period when the customer has an account with us, and a further five years, and such further period during which you may bring a claim against us and for us to be able to defend ourselves. Where you apply for an account but we do not proceed, we will store your information for a reasonable period in case you make a repeat application

We will keep information about visitors to our websites (not being customers) for a reasonable length of time that lets us understand how people use our website and any technical issues they have. Usually this will not exceed 12 months.

We will keep information about individuals who are our contacts at our business customer and suppliers for the duration of our relationship with the relevant business and where we are not made aware that the individual no longer works for it. We may keep our correspondence with these individuals for longer where relevant to our transactions with the business.

For deleting your personal data please contact support

Information we share with employees and partners

There are certain circumstances where we may transfer your personal data to our employees, contractors and to other parties, as selected according to different case.

In addition, we may convert your personal information into anonymous or aggregated form, in which case it will cease to be personal data.

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We may transfer your personal information to potential buyers of our business, and to our professional advisers (such as lawyers, accountants, auditors, IT consultants, management consultants), located in and outside the EEA.

Your personal information may be transferred to other third party organizations if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority.

Where your information will be held.

Your information may be transferred outside the European Economic Area (EEA).

Some of those countries do not have equivalent data protection laws to those applicable in the EEA.

However, to ensure your personal information is properly protected in line with EU and UK data protection law, the transfer of this information is, in general, governed by a contract including Standard Contractual Clauses approved by the European Commission in accordance with Article 46(2)(c) of the General Data Protection Regulation (GDPR).

In some limited circumstances, we may also transfer your information outside the EEA if the GDPR (under Article 49) allows this. This includes where it is necessary for the performance of a contract between us and you. This also includes where the transfer is necessary in connection with legal proceedings.

Using cookies.

If you access our information or services through the Tranzo website, you should be aware that cookies are used. Cookies are data files stored on your browser. If you have accepted cookies by using tools displayed when entering the Tranzo website, the website automatically installs and uses them on your browser when you access it.

Your Rights

You have certain rights in relation to your information. Pursuant to the GDPR you have the following rights:

- Right to be informed, which is satisfied through this notice.

The availability of these rights and the ways in which you can use them are set out below in more details:

- You are entitled to ask us if we are processing your information and, if we are, you can request access to your personal information. This enables you to receive a copy of the personal information we hold about you and certain other information about it. We do not have to provide this information if this would adversely affect the rights and freedoms of others.

- You are entitled to request that any incomplete or inaccurate personal information we hold about you is corrected.

- You are entitled to ask us to delete or remove personal information in certain circumstances, including where you have withdrawn consent to our using it or we no longer need it in connection with your account or for other legitimate reasons. There are also certain

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exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.

- You may ask us to suspend the processing of certain of your personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- You are entitled to request the transfer of certain of your personal information to another party/company. This is where we use it based on your consent or on a separately agreed agreement with you personally.

- Where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

- You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.

- You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident where we are based or where an alleged infringement of Data Protection law has taken place.

Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights, please contact us.

Informational security

We are committed to keeping your personal information safe. We've got physical, technical and administrative measures in place to prevent unauthorized access or use of your information.

Links to third party website

Our website, newsletters, email updates and other communications, from time to time, may contain links to and from the websites of others including our partner networks, advertisers and other group companies and/or social networks as offered to you and supported by your browser.

The personal data that you provide through these websites is not subject to this Privacy Policy and the treatment of your personal data by such websites is not our responsibility. If you follow a link to any of these websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy notices of entities through which you chose to share.

Automated decision making

We may use some instances of your data in order to customize our Services and the information we provide to you, and to address your needs - such as your country of address and transaction history. For example, if you frequently send funds from one particular currency to

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another, we may use this information to inform you of new product updates or features that may be useful for you. When we do this, we take all necessary measures to ensure that your privacy and security are protected - and we only use pseudonymized data where ever possible.

Children

We do not knowingly collect information from children or other persons who are under 18 years old. If you are under 18 years old, you may not submit any personal information to us or subscribe for the services. If you believe we might have any personal information from or about a person under the age of 18, please contact the DPO.