



## Conmodum Privacy Policy

Updated – August 07, 2024

1. For the purpose of compliance with the relevant data protection legislation, the party controlling your personal data is Conmodum Limited (hereinafter – “Conmodum”, “us” or “we”). This policy (together with our Customer Agreement and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please, read the following carefully to understand the types of information we collect from you, how we use that information, and the circumstances under which we will share it with third parties. By visiting our website (“Website”) at [www.conmodum.me](http://www.conmodum.me) or using the Conmodum mobile application (“App”) you are accepting and consenting to the practices described in this policy. Unless the context otherwise requires, a reference to the Website shall be deemed to also refer to the App.
2. In order to show respect for your individual rights to privacy, Conmodum processes the collected personal data in accordance with the Law on Legal Protection of Personal Data of the United Kingdom, the General Data Protection Regulation, and other legal acts such as the Directive No. 95/46/EC of the European Parliament. The employees, agents and other parties who have access to your personal data are committed to ensuring its safety even upon termination of the contractual relationship.
3. It is possible that Conmodum may engage data processors and third parties, who will perform certain functions on behalf of Conmodum. Conmodum bears the responsibility to ensure that the latter treat sensitive data in compliance with the active legislation and given instructions. Conmodum can also request certain security measures, and monitor their implementation. Under those circumstances, Conmodum guarantees the imposition of the non-disclosure obligation, which will prevent parties from using information beyond the scale necessary to perform the given functions.
4. This Privacy Policy introduces the basic principles that Conmodum follows when collecting, storing, and processing your personal data and other information related to you. It also outlays the aim of processing personal data, as well as the sources, recipients, and other important aspects of data processing in using the services of Conmodum as a payment services provider
5. Providing personal data is necessary in order to continue using the services provided by Conmodum. For instance, it is a required step in the Stachel account opening procedure. Personal data you provide is processed within the system in order to complete the established identification procedures.
6. By further proceeding with your activity on the website, you acknowledge and confirm that you have familiarized yourself with the Privacy Policy, understood it, and agreed with its provisions. Conmodum bears the right to update and revise the provisions, which implies that it is solely your

responsibility to keep yourself familiarized with the latest version of this Privacy Policy. Purposes, Recipients, and Information we may collect about you

7. The core reason for data collection is provision of Conmodum services to individuals who transact within the system. As a payment service provider, Conmodum is required by law to establish and verify your identity before it begins to cooperate with you and provide any sort of financial services. Conmodum has the right to store any initially and further requested information throughout the retention period estimated by the relevant legislation. Therefore, the Client is obliged to provide valid and complete information.

8. PURPOSE: identification of Client's identity, provision of payment services (account opening, transfers of funds, payment collection, and other), implementation of other legal obligations of the payment service provider.

8.1. Personal data collected for the purposes listed above is processed within the following legal framework:

- 8.1.1. establishing and verifying the identity of the Client;
- 8.1.2. concluding agreements with the Client to proceed with fulfilling his requests;
- 8.1.3. executing financial transfers in compliance with legislation;
- 8.1.4. following the "Know Your Client" provisions;
- 8.1.5. conducting systematic monitoring;
- 8.1.6. carrying out a risk assessment;
- 8.1.7. ensuring the accuracy of data provided by the Client;
- 8.1.8. preventing possible money laundering, terrorist financing, and fraud; timely detecting, profoundly investigating, and informing of such activity, acting by financial sanctions imposed on the Client;
- 8.1.9. effective performing of risk and organization management.

8.2. The processing of the following data is a priority by the above-listed provisions: name, surname, personal identification number, address, date of birth, identity document information, photo, direct video transmission recording, citizenship, email address, phone number, payment account number, IP address, current activity, current public function, and any other data required by the Law on Prevention of Money Laundering and Terrorist Financing.

8.3. The relevant information is collected and processed on the grounds of a legal obligation imposed on Conmodum as the payment service provider by the Law on Payments of the United Kingdom, the Law on Electronic Money and Electronic Money Institutions of the United Kingdom, and the Law on Prevention of Money Laundering and Terrorist Financing of the United Kingdom. Therefore, in order to open an account and/or use Conmodum's payment services, the Client is obliged to provide a full set of requested documents.

8.4. Parties that might be among the recipients of Client-related data:

- 8.4.1. supervisory authorities;
- 8.4.2. credit, financial, payment and/or electronic money institutions (subject to the Customer's consent and in the scope of the Personal data solely specified by the Customer);
- 8.4.3. pre-trial investigation institutions;
- 8.4.4. the State Tax Inspectorate;
- 8.4.5. payment service agents or other representatives of Conmodum (if their services are essential for carrying-out an operation);

- 8.4.6. beneficiaries of transaction funds receiving the information in payment statements together with the funds of the transaction;
- 8.4.7. debt collection and recovery agencies;
- 8.4.8. companies processing consolidated debtor files;
- 8.4.9. lawyers and law firms;
- 8.4.10. auditors;
- 8.4.11. credit / debit card processing service providers;
- 8.4.12. identity verification service providers;
- 8.4.13. sanction / PEP screening providers;
- 8.4.14. vendors of software development and support services;
- 8.4.15. transaction monitoring service providers;
- 8.4.16. risk management tools providers;
- 8.4.17. website domain hosting providers;
- 8.4.18. cloud service providers;
- 8.4.19. other Conmodum suppliers with the purpose of proper fulfillment of Conmodum services.

8.5. Clients' Personal data may be transmitted to third parties not specified above for specified and legitimate purposes only, and only to third parties who have the right established by laws and other legal acts to receive personal data in the countries of the European Union and the European Economic Area. When the processing of Customer information described above may involve sending it to countries outside of the EEA, Conmodum will take all reasonable steps to ensure that the Clients' data is treated securely and in accordance with this Policy.

## 9. PURPOSE: Debt management.

9.1. Under this provision, Client-related information is processed to manage issues related to debt collection, submission of claims, demands, lawsuits, and other documents.

9.2. Processing of the following data can be involved: name, surname, personal identification number, address, date of birth, data from an identity document, email address, phone number, payment account number, IP address, payment account statements

9.3. Groups of data recipients: companies processing consolidated debtor files, credit, financial, payment and/or electronic money institutions, lawyers, courts, pre-trial investigation institutions, the State Tax Inspectorate, debt collection and recovery agencies, and other entities having a legitimate interest.

9.4. Third countries may also obtain access to the data, yet only in the case it/its national is directly involved in your payment transfer execution.

## 10. PURPOSE: Supporting and managing relations with Clients, preventing disputes and collecting evidence (recording phone conversations), correspondence of business relations with the client.

10.1. Processing of Client's data can be involved for reasons of:

10.1.1. protecting the interests of the Client and/or Conmodum;

10.1.2. preventing disputes, providing evidence of business communication with the client (recordings of conversations, correspondence);

10.1.3. ensuring the top-level quality of services provided by Conmodum;

10.1.4. executing Client's requests, following the obligations levied by law or other legal documents.

10.2. The following Client-related information may be processed: name, surname, address, date of birth, email address, phone number, IP address, payment account statements, phone conversation recordings, correspondence with the client.

10.3. Data recipients: supervisory authorities, companies processing consolidated debtor files, lawyers, bailiffs, courts, pre-trial investigation institutions, debt collection and recovery agencies, other entities having a legitimate interest, other entities under an agreement with Conmodum, strictly upon reception of a separate consent from you.

10.4. No third country may be granted access to such data.

