PRIVACY POLICY

For the purposes of data protection regulations, TransferPay International Ltd (hereinafter TransferPay) is the "data controller" of your information. We are located at Unit 3 1st Floor 6/7 St. Mary At Hill, London, England, EC3R 8EE. Our registration number with the UK Information Commissioner's Office (ICO) is ZA704865 (https://ico.org.uk/ESDWebPages/Entry/ZA704865). If you have additional questions about our privacy policies and how we protect or use your data, you can send us an email at privacy@transferpay.uk

Personal data collected by TransferPay is processed in accordance with the UK Personal Data Legal Protection Act and the General Data Protection Regulation (hereinafter - the GDPR) and other legal acts. All employees, agents and employees of TransferPay agents who know the secrecy of personal data must keep it safe even after termination of employment or contractual relationship.

TransferPay, in accordance with applicable legal requirements, will guarantee the confidentiality of personal data and the implementation of appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, accidental loss, alteration, destruction or other illegal processing.

This Privacy Policy sets out the basic rules for the collection, storage, processing and retention of your personal data, other information related to you, the scope, purpose, sources, recipients and other important aspects of your personal data when you use TransferPay as payment service provider.

By accessing and / or using the information on this website and / or our services, you acknowledge and confirm that you have read, understood and accept this Privacy Policy. Also, after you sign in to the system and start using our services, this Privacy Policy becomes a mandatory Supplement to the General Agreement for payment services.

TransferPay reserves the right, at its own discretion, to modify this privacy policy at any time by posting an updated version of the privacy policy on the website and notifying registered users by email. A modified or updated version of this Privacy Policy that will take effect immediately and become effective as of its publication on the website. If the user of the services is a legal entity, this Privacy Policy applies to natural persons whose data is transmitted to us by the legal entity. The user will inform the interested parties (managers, recipients, agents, etc.) of the transfer of their data to TransferPay in accordance with article 14 of the RGPD.

Purposes of Processing, data providers, terms and recipients

The primary purpose for which TransferPay collects your personal data is to provide TransferPay payment services to customers who send and receive payments. As a payment service provider, TransferPay is required by law to establish and verify your identity before conducting financial services transactions with you, also, at the time of service provision, to request further information, as well as to evaluate and store this information during the period established by legislation. With this in mind, you should always provide correct, truthful and complete information.

PURPOSE: Identification of the client, provision of payment services (account opening, transfer of funds, collection of payments and others) or implementation of other legal obligations of the payment service provider.

Personal data is processed for this purpose in accordance with the legal requirements related to:

- Determination and verification of the identity of the client;
- Conclusion and execution of agreements with the client or to take measures at the client's request;
- Execution of funds transfers and transmission of necessary information together with a transfer in accordance with the legislation;

- Implementation of the "Know your customer" requirements;
- Continuous and periodic monitoring of customer activity;
- Risks evaluation;
- Update customer data to ensure accuracy;
- Prevention of possible money laundering and terrorist financing, fraud prevention, detection, investigation and information of said activity, determination of politically exposed persons or financial sanctions imposed on the client;
- Ensure proper risk management and organization;
- For this purpose, the following personal data can be processed: name, surname, national identification number, address, date of birth, data from an identity document and a copy of the document, a face photo, direct video transmission (broadcast direct video) registration, citizenship, email address, telephone number, checking account number, IP address, current activity, current public function and other data required by legal acts governing the prevention of money laundering and financing of terrorism.
- This personal data is collected and processed on the basis of a legal obligation imposed on the payment service provider, that is, the Payments Law, the Law of Electronic Money and Electronic Money Institutions, laws on the prevention of money laundering and terrorist financing, and other applicable legal acts, and is required to open an account and / or provide a paid service.
- Data retention period: 8 (eight) years after the end of the business relationship with the client. The retention period may be extended for a period not to exceed 2 (two) years, provided there is a reasoned request from a competent authority. Such a data retention period is required by the UK Money Laundering and Terrorism Financing Prevention Act.
- Data providers: the interested party, credit institutions and other financial entities and their branches, state and non-state registries, databases to verify the identity document data (databases of expired documents and other international databases), authority verification records (notary authority records and other databases), the Register of Disabled and Handicapped Persons, the Population Register, other databases, companies that process consolidated debtor files, companies that maintain sanctions records international, law enforcement agencies, bailiffs, legal entities (as long as you are a representative, employee, founder, shareholder, participant, contractor or beneficial owner of these legal entities), partners or other legal entities that contract with us or participate in the provision of services, social networks where you have a profile linked to our system and other people.
- Data recipient groups: supervisory authorities, credit, financial, payment and / or electronic money institutions, pre-trial investigation institutions, state tax agencies, payment service representatives or TransferPay partners (if the transaction is performs using its services), recipients of the transaction funds who receive the information in the payment statements together with the transaction funds, the payment service providers and correspondents of the recipient, the participants and / or the parties related to national, European and international payment systems, debt collection and recovery agencies, consolidated debtor file processing companies, lawyers, bailiffs, auditors, other entities that have a legitimate interest, others under an agreement with TransferPay or on other legal bases.

Debt management

Personal data under this purpose is processed to manage and collect debts, file claims, demands, legal complaints and other documents, and to provide documents for debt collection.

- For this purpose, the following personal data can be processed: name, surname, national identification number, address, date of birth, identity document data, email address, telephone number, checking account number, IP address , current account statements and other data related to the circumstances in which the debt arose.

- Data retention period: the maturity date of the debt is 10 (ten years) from the day the debt is incurred, and after the opening of legal proceedings, the term is extended until the debt is refunded and for 24 (twenty-four) months after the refund. The data retention period is based on the limitation periods for procedures established by the UK Civil Code.
- Data providers: the interested party, credit, financial, payment and / or electronic money institutions, state and non-state registries, companies that process consolidated debtor files, other people.
- Data Recipient Groups: Companies that process consolidated debtor files, credit, financial, payment, and / or electronic money institutions, lawyers, bailiffs, courts, pretrial investigation institutions, state tax agencies, collection agencies, and debt recovery and other entities that have legitimate interest.
- Please note that if you have a debt with TransferPay and you postpone the fulfillment of your obligations for more than 30 (thirty) days, TransferPay has the right to provide information about your identity, contact information and credit history, that is, financial history. and property liabilities and information on their execution, and debts and their payment to companies that manage debtor databases, as well as debt collection companies. You can access your credit history by contacting the credit bureau directly.

Inform the client about the services

Personal data for this purpose is processed in order to inform the customer about the services provided by TransferPay, their prices, details, changes in the terms of the agreements concluded with the customer, and to send the system and other messages related to the services provided by TransferPay.

- The following personal data may be processed for this purpose: email address, telephone number.
- The interested party confirms that they are aware that said messages are necessary for the execution of the General Agreement for payment services and / or its complements concluded with the client, and are not considered direct marketing messages.
- Data retention period: 24 (twenty-four) months after the end of the business relationship with the client.
- Data providers: the interested party.
- Recipients of the data: the data for this purpose is not provided to other people.

Direct marketing

For this purpose, personal data is processed to provide the customer with offers on the services provided by TransferPay.

- The following personal data may be processed for this purpose: email address, telephone number.
- With this document, you confirm that you are aware of the fact that the aforementioned data may be processed for direct marketing purposes, and that you have the right to disagree and object to the use of your personal data for this purpose at any time by informing TransferPay by written by email to: privacy@transferpay.uk . The message must contain the full name and email address of the interested party.
- Data retention period: 2 (two) years after the end of the business relationship with the client or until the day the client objects to the data processing for this purpose.
- Data providers: the interested party.
- Recipients of the data: the data for this purpose can be transmitted to search systems or social networks (the websites of these systems guarantee the possibility of objecting to the data processing). The data will not be provided to other people.

Prevention of misuse of the service and adequate delivery of the service

The data collected for all of the above purposes can be used to prevent unauthorized access and use, that is, to ensure the privacy and security of the information.

- For the processing of personal data, TransferPay may hire data processors and / or, at its own discretion, hire other people to perform certain ancillary functions on behalf of TransferPay (for example, data centers, hosting, cloud hosting, systems administration, systems development, software). development, provision, support services such as improvement and development; customer service center services; marketing, communication, consulting, temporary staff or similar services). In such cases, TransferPay will take the necessary steps to ensure that such data processors process personal data in accordance with TransferPay's instructions and applicable laws, and will require compliance with appropriate personal data security measures. TransferPay will also ensure that such persons are bound by confidentiality obligations and cannot use such information for any purpose other than the performance of their duties.
- The personal data collected for the specific purposes in this Privacy Policy will not be processed in any way incompatible with these legitimate purposes or legal requirements.
- I agree that my aforementioned data will be provided and received through a software tool used by TransferPay or its authorized agent, also by other means and third parties with whom TransferPay has entered into personal data processing agreements in accordance with laws and regulations. .

Geographic processing area

In general, personal data is processed within the UK and the European Union / European Economic Area (EU / EEA), but in certain cases it can be transmitted and processed outside the EU / EEA.

Personal data may be transferred and processed outside the EU / EEA when the transfer is necessary for the conclusion or execution of a contract (for example, when a payment is made to a third party or through a third party partner (correspondent)) or with the consent of the client. In all these cases, we seek to ensure that appropriate technical and organizational measures exist.

Treatment of personal data of minors

A minor under 14 (fourteen) years of age, who wishes to use TransferPay's payment services, must provide the written consent of their representative (parent or legal guardian) regarding the processing of their personal data.

Cookies policy

TransferPay may use cookies on this website. Cookies are small files sent to a person's Internet browser and stored on their device. Cookies are transferred to a personal computer when visiting the website for the first time. Later, cookies are used to identify the person. They are designed to improve the functionality and use of the website, also for analysis purposes, and to speed up access to the website and the information contained therein.

Like most website administrators, TransferPay monitors website traffic and collects information on the number of visitors browsing the website, the domain name of visitors' Internet service providers, etc. . Such information is automatically collected when you visit the website. It helps the website administrator to understand how visitors use the website and to improve the services provided by TransferPay.

By browsing the website and not changing the settings, the person visiting the site accepts the use of cookies.

Most web browsers accept cookies, but the person can change the browser settings so that cookies are not accepted. However, in this case, some functions may not work.

The right of access, rectification, erasure of your personal data and restrict data processing.

TransferPay informs you that you have the following Rights:

THE RIGHT OF ACCESS TO DATA: to obtain information on whether or not TransferPay processes your personal data and, in this case, access to the personal data processed by TransferPay and to receive information on what personal data and from which sources are collected, the purposes of the processing, the recipients to whom the personal data has been or can be provided; Obtain from TransferPay a copy of the personal data that is processed in accordance with applicable law. Upon receipt of your written request, TransferPay will provide you with the requested data in writing or specify the reason for the denial within the period established by law. Once in a calendar year, data can be provided free of charge, but in other cases remuneration can be set at a level not to exceed the cost of providing data.

THE RIGHT OF RECTIFICATION: if your data processed by TransferPay is incorrect, incomplete or inaccurate, you can contact TransferPay in writing to rectify incorrect or inaccurate data or to complete incomplete personal data by providing a relevant request;

THE RIGHT TO BE FORGOTTEN: request the termination of the data processing (delete the data), in the event that the interested party withdraws the consent on which the processing is based, or personal data is no longer necessary in relation to the purposes for which they were collected, or the personal data was processed illegally, or the personal data must be erased to comply with a legal obligation. A written notice of objection to the processing of personal data will be sent to TransferPay in person, by mail or by electronic means of communication. If your objection has legal grounds, TransferPay, after examining the request, will terminate any action to process your personal data, with the exception of cases provided by law. It should be noted that the right to demand the immediate deletion of your personal data may be limited or impossible due to TransferPay's obligation as a payment service provider to store data on customer identification, payment transactions, concluded agreements, etc. for the period established in the legislation;

THE RIGHT TO RESTRICTION OF PROCESSING: request to restrict the processing of personal data, when the accuracy of the personal data is contested by the interested party, for a period that allows the controller to verify the accuracy of the personal data; the processing is illegal and the interested party opposes the deletion of personal data and requests the restriction of its use; the controller no longer needs the personal data for the processing, but the interested party requires it for the establishment, exercise or defense of legal claims. The data controller will inform a data subject that they have obtained a processing restriction before the processing restriction is lifted;

THE RIGHT TO OBJECT: the right to object to the processing of your personal data for direct marketing purposes;

- To address the supervisory authority with a complaint regarding the processing of your personal data, if you believe that the personal data is processed in violation of your legitimate rights and interests stipulated by applicable law;
- Contact the data controller and / or the data protection officer in order to exercise your rights;
- Other legal rights.

You can send your request for access, rectification or objection to data processing by email to: privacy@transferpay.uk . The person submitting the application must clearly indicate their full name and add a copy of their identity document or sign the application electronically.

Third party websites

TransferPay is not responsible for the protection of the privacy of the Client on the websites of third parties, even if the client accesses said websites through the links provided on this website. TransferPay recommends knowing the privacy policies of each website that does not belong to TransferPay.

The use of logos

The customer, using the TransferPay services for business purposes and professional interests, agrees that TransferPay may use his name and / or logo for direct marketing purposes (for example, by indicating that the customer is using the services provided by TransferPay).

Ensuring the security of information

TransferPay aims to guarantee the highest level of security for all information obtained from the Client and public data files. To protect this information from unauthorized access, use, copying, accidental or illegal deletion, alternation or disclosure, as well as any other unauthorized form of processing, TransferPay uses legal, administrative, technical and appropriate physicals.

Final provisions

These privacy policy provisions are subject to UK law. All disputes related to the provisions of the Privacy Policy will be resolved by negotiation and in the event that a problem is not resolved by negotiation, the dispute will be brought to the UK courts.