

## Privacy Policy

### General Information

This Privacy Policy explains how Moneynetint Ltd (or just “we”) collects and deals with information about individuals. Where we use the term “you” in the policy, we assume you are an individual.

Please read this Privacy Policy carefully, because each time you provide personal information to us (for example, when you access this website) this sets out how we deal with that information.

If you disagree with this policy, please do not visit our website, use or access our content and/or services.

Click on the links below to go straight to more information on each area:

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**Important Note:** Moneynetint does not provide its services to people under the age of 18. Therefore, we kindly ask you not to upload, send or otherwise furnish to us any information if you under the age of 18.

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Riley Studios, 724 Holloway Road, London | N193JD, UK



## Who we are

Moneynetint Ltd. is registered in England, registration number 05246578 and have our registered office at Second Floor, 201 Haverstock Hill, London NW3 4QG. Our main trading address is at Riley Studios, 724 Holloway Road, London, N193JD, UK.

We are regulated and authorised by the Financial Conduct Authority (Reference Number 900190) to carry on electronic money services activities as an Authorised Electronic Money Institution (AEMI), under the Electronic Money Regulations 2011 (EMRs). We also have a branch in Hong Kong and where we hold a Money Service Operator, authorized by Customs and Excise Department, HK (License No. 13-07-01230).

## How do we collect Information about you

We may collect information relating to you in various ways:

- You may provide us with that information directly. Typically this will happen when you:
  - apply or use our services;
  - enter into an arrangement with us for provision of services or another agreement;
  - subscribe to our newsletter or register to receive other communications;
  - make a call to us; or
  - participate in our surveys or marketing campaigns.
- We may receive that information directly from business customers (such as companies or partnerships) which have applied for or are receiving our services and they have provided us with information about you as part of the services they are requesting us to provide.
- We may collect information about you automatically (when you visit our website or our social media account). Typically this will happen when you:
  - submit inquiries through our registration system or social media accounts;
  - use our website (we collect information about you through the use of cookies and similar technologies; to learn more about the cookies we use see our [Cookies Policy](#))
  - make public posts on social media platforms that we follow.
- In certain cases when the law allows, we may acquire information about you from third parties and may collect information about you from publicly available sources. This may include information shared by our partners, marketing agencies, your publicly available profile information (LinkedIn, Facebook, Twitter, Instagram). We may link information provided by yourself, collected from public and commercial sources to

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other information we obtain from you or about you. See your rights [below](#) to find out what information we may hold or deal with about you.

### **What information about you do we deal with**

Although we collect as limited information relating to you as possible, we do collect the following information:

- information from you directly (in registration forms or calls with us) which is essential for us in order to provide you with our services, such as your name, surname, address, your phone number, e-mail address, nationality, passport number, bank account details;
- information you give us in surveys;
- information about your preferences and interests (which you may provide to us directly or we obtain it from publicly available sources such as social media);
- information necessary to verify age and identity;
- information related to a technical device you use to access our services (including information about your activity on our websites such as, your IP address, operating system version, and settings of the device you use to access our content/products; log information: time and duration of your login session, search query terms you enter through our website, and any information stored in cookies that we have set on your device; location information such as your device's GPS signal or information about nearby WiFi access points and mobile towers that may be transmitted to us when you use our website content).

You may choose not to disclose certain information to us, but in that case you may not be allowed to receive all or part of our services.

### **Reasons we are allowed to deal with information about you**

In order to deal with information about individuals, we need a valid legal reason to do so. Each such allowable reason is known as a “basis of processing”. We need a valid legal basis of processing for *each* purpose for which we use information relating to you.

**Purposes:** We use the information we describe above for the following different purposes:

- to provide our services;
- to run Anti-Fraud, Anti-Money Laundering and Counter-Terrorist Financing checks;
- To monitor ongoing activity of our customers including scrutiny of transactions undertaken throughout the use of our services.
- to provide service-related information you request;

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- for marketing purposes, such as providing customized advertisements and sponsored content and sending promotional communications; assessing and analyzing our market, clients, products and services;

**Important Note:** You may opt out of direct marketing communications from us at any time. If you prefer not to receive our direct marketing communications, please let us know by sending us an e-mail to [support@moneynetint.co.uk](mailto:support@moneynetint.co.uk) or clicking on the opt-out link appearing in the newsletter

- to understand the way people use our online services so that we can improve them and develop new content, products and services;
- to protect our interests in the event of a dispute.

#### Reasons for dealing with that information

We set out each basis of processing for each purpose in the table below

Purpose of use	Legal basis	Example of Relevant Information
To provide our payment and related services	<p>- We need to deal with information because it is necessary for a contract, we have with you or with a contract you may have with one of our corporate clients.</p> <p>- In accordance with the law requirements.</p>	Name, surname, payment methods and details (incl. bank details), address, passport number, phone number, email address, nationality, residential address and supporting documents such as passport copy and utility bills
To run Anti-Fraud, AML and CTF Checks	- In accordance with the law requirements.	Information you have provided during onboarding or monitoring processes, including, criminal records checks (DBS) and information collected automatically.
To provide information to you about our services, at your request	- It is in our legitimate interests to market our services to you.	- Contact details you have given us

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<b>For marketing purposes</b>	<b>It is in our legitimate interests to inform you about our services, events, news and other relevant</b>	<b>Contact Details, social media account details, your interests</b>
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Moneynetint, Ltd. is a Financial Conduct Authority (FCA) regulated company and is authorized under the Electronic Money Regulations 2011 for issuing electronic money (Reg. No. 900190)

	information	
<p><b>Security and Performance</b></p>	<p>It is our legitimate interests to ensure security of our website</p>	<p>IP address, operating system version, time and duration of your login session, search query terms you enter through our website, information stored in cookies, your device's GPS signal or information about nearby WiFi access points and cell towers that may be transmitted to us when you use our website content.</p>
<p>To understand the way people use our online services so that we can improve them and develop new content, products and services</p>	<p>It is our legitimate interests to monitor the quality of our services, develop and improve the content we provide</p>	<p>Customers satisfaction surveys, analytical cookies (if opted in), consumer behavior information provided if you complain about our firm, services and products</p>
<p>To protect our interests in the event of a dispute</p>	<p>It is in our legitimate interests to defend against lawsuits and claims</p>	<p>The information set forth above, including recorded communications (such as emails, calls), legal documentation and complaints.</p>

In any other case, where we do not base our use of information about you on one of the above legal bases, we will ask for your consent before we deal with such information and we will tell you clearly the reason we are asking your consent for.

Where we might need to use information about you for purposes other than described above,



we will let you know the legal basis then and also, provide a supplemental notice to you.

### **To whom we disclose information relating to you?**

We may disclose your personal data to the following entities:

- Our subsidiary, M-Net Limited (in the United States of America) subject to the purposes and legal basis set forth in the above section.
- Banks and/or companies that provide payment services to us in order to facilitate your transactions.
- Limited number of service providers that provide services for us, such as partners that provide screening services, Anti-Fraud, AML or CTF, ID verification checks.

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- Affiliates or referring parties, if you were referred to us by them.
- Other third parties, when so required by law. For example, public authorities involved in crime investigation, authorities supervising activities in the payment sector, pre-trial investigation officials, courts, etc.
- In addition, we are using 1<sup>st</sup> tier cloud services and CRM (Customer Relationship Management) systems, in order to store your information, in a highly secure way.
- We are permitting third-party service providers (such as Vonage Nexmo) to send OTP verification messages to all registered account users at Moneynetint for security purposes. The OTP verification message will be delivered to phone number of the authorized users (including when using US numbers) when they login to their account and no charges will be applicable to the user. Customers personal information will not be sold or remarketed.

We will take all reasonable steps required to prevent all these entities from using your information for purposes other than providing services to us.

### **To what countries do we transfer your personal information relating to you?**

At times we may have to transfer your personal data to countries outside the European Economic Area. Mainly, U.K., U.S.A, Israel and India. Where we do this, to protect your information, we will ensure that:

- The U.K. is recognized by the European Commission as applying adequate data protection standards – so you are also protected by the UK law and the ICO as the regulator.
- If that country is Israel, a recipient in Israel is recognised by the European Commission as applying adequate data protection standards – so you are also protected by Israeli law.
- If that country is the United States of America, we will ensure that we have in place a written contract with the data recipient based on the standard contractual clauses adopted by the European Commission – which safeguards your rights and the protection of your information.
- Where that country is India, we have in place a written contract with the data recipient based on the standard contractual clauses adopted by the European Commission – which safeguards your rights and the protection of your information.
- In addition, as we mentioned above, Moneynetint has financial partners, namely, banks and other regulated payment services providers, that enable it to facilitate the transactions you wish to make. So when you send a request to execute a transaction through our system, we transfer the required information to those corresponding or intermediate banks and PSPs, who may be also located outside the EEA.

### **How do we protect personal information relating to you?**

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We have put in place reasonable and appropriate physical and technical measures to safeguard the personal information relating to you that we use. Our employees and relevant partners are under strict legal commitments to keep information about you confidential (including information about visitors to our website/social media accounts). We manage access rights on an ongoing basis and making sure that only employees or partners with a need to know basis will have access to your information. We implemented strict password policy, encryptions, servers hardening, security suits (such as firewalls, anti-viruses) and other measures in order to reduce cyber-attacks risks or other unauthorised access or use to your information. Please note, however, that although we take reasonable steps to protect your information, no website, Internet transmission, computer system or wireless connection is completely secure.

### How long do we keep personal information relating to you?

We retain personal information relating to you for the period necessary to fulfil the purpose for which they were collected, but in any event the retention period will not extend beyond 7 years. After that, we will delete it, except where we are legally obligated to retain the information. On expiration of this period, the data will be irretrievably deleted.

Normally, personal data storage periods are as follows:

Personal data	Retention period
Accounts Records Data	7 years after the account closure
Personal data used for marketing purposes	After you have asked us not to contact you, except for the minimal information required to identify you and avoid to resend you marketing materials.
IT System Logs	7 years after creation of the record
Cookies info	See our <a href="#">Cookies Policy</a>

### Rights that you have

Under certain circumstances, you have rights under the data protection laws in relation to your personal information, as summarized below.

You have the right to:

- 1. Request access to your personal information** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 2. Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though

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we may need to verify the accuracy of the new data you provide to us.

**Request erasure of personal information.** This enables you to ask us to delete or remove personal information 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 information 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 information to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

3. **Object to processing of your personal information** where we are relying on a legitimate interest (of our own or 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 information 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.
4. **Request restriction of processing of your personal information.** This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
5. **Request to transfer your personal information to your or to a third party.** We will provide to you, or a third party you have chosen, your personal information 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.
6. **Withdraw consent at any time where we are relying on consent to process your personal information.** 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.

If you wish to exercise any of the rights set out above, please contact our Support Department at [Support@moneynetint.com](mailto:Support@moneynetint.com). We aim to respond to all legitimate requests within one month. Occasionally it may 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.

You will not have to pay a fee to access your personal information (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 may refuse to comply with your request in these circumstances.

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We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

### **Your right to lodge a complaint with the Data Protection Supervisory Authority**

If you feel that we have not handled information relating to you properly or if you have contacted us about how we use that information and are unhappy with our response, you have the right to lodge a complaint with the local Data Protection Supervisory Authority or the Information Commissioner's Office.

By phone: 0303 123 1113.

Online: <https://ico.org.uk/concerns/>

### **Contact us**

If you discover any inconsistency in this Privacy Policy, any security issue on our website, or have other questions related to the processing of your personal data, please contact us in a manner convenient to you using the contact details below:

Mailing address: Riley Studios, 724 Holloway Road, London, N193JD, UK

Telephone: +44 1392 58 1196

E-mail: [Support@moneynetint.co.uk](mailto:Support@moneynetint.co.uk)

The person responsible for dealing with information about individuals is available to you at [Legal@moneynetint.com](mailto:Legal@moneynetint.com)

### **Final Provisions**

We will review this Privacy Policy at least once every year. We will notify you about changes to this Privacy Policy that we consider material by posting a notice on the specific website. By continuing to access or use our content and/or services after we have posted such notice you agree to be bound by the new terms set out in the update.

Approved by Order No [05-24] issued by the Managing Director on [24] [05] 2018.

*Last reviewed 28 March 2023.*

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