



# PRIVACY POLICY

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## General

FoPayPro - is a Ukrainian blockchain-based secure online transparent payment system for eliminating intermediaries and strengthening of merchant-user connection. FoPayPro payment system can be used for e-commerce, online shops and other online businesses.

FoPayPro is a transparent payment system meant to eliminate intermediaries and strengthen merchant-user connection. Conduct fast and cheap transactions and store your income in a secure multi-wallet.

This Privacy Policy ("Privacy Policy") which can be found at <https://fopaypro/Privacy-Policy.pdf> Please find below some simple definitions that may help you to understand this Privacy Policy:

- 1) fopaypro.com affiliates: subsidiaries, parent companies, and companies under common control.
- 2) Personal Information (personal data): any information which, either alone or in combination with other data, enables you to be directly or indirectly identified, for example your name and email address.
- 3) Data subject: an identified or identifiable person (our User).
- 4) Data controller: a company which determines purposes and means of personal data processing.
- 5) Data processor: a company which processes personal data on behalf and upon instructions of the Data controller.
- 6) Our Site: website with the following domain as fopaypro.com, which used for providing our services to you and informing our Users/Site visitors on our promotional, marketing campaigns and special offers.
- 7) Personal data processing: any operation or set of operations performed on personal data (e.g., including but not limited to collection, storage, use, disclosure, erasure).
- 8) Other capitalized terms, not defined above, have the meanings as set in the Terms of Service and the applicable data protection legislation.

Please read the following carefully to understand what Personal Information and general data we collect, how it is being used and the ways it can be shared by us.

IF YOU DO NOT WISH FOR YOUR PERSONAL INFORMATION TO BE USED IN THE WAYS DESCRIBED WITHIN THIS PRIVACY POLICY THEN YOU SHOULD NOT ACCESS OR USE THE SITE OR USE THE SERVICES, FUNCTIONS, OR FEATURES OFFERED FROM TIME TO TIME ON THE SITE (“Services”).

## 1. Collection and use of Personal Information

### 1.1. Information you give to us

We collect your Personal Information if you use Site and open an Account to use the Platform or perform any Transactions on the Platform. This is defined as collection for the purpose of provision of Service(s) to you in accordance with our Terms of Service. Be kindly advised that if you refuse to share your Personal Information under terms and conditions hereof, we will not be able to provide our Services to you.

The types of Personal Information which we may require you to provide us with include:

- 1) your name;
- 2) your e-mail address;
- 3) Device Type;

We will process your Personal Information only for the purpose(s) of providing to you the service(s) that you ask us to provide you with, to satisfy the legal obligations stemming from regulatory obligations that arise from providing you the service(s) and our legitimate interest.

### 1.2. Information we collect about you

Each time you use the Services, we may automatically collect the following information, which may be considered to be Personal Information when combined with other information about you:

- 1) technical information, including the device type used to connect our website.
- 2) information about your visit, including the dates and times you use the Site

### 1.3. Cookies

Please be kindly informed that we use such browser feature as a “cookie” to assign a unique identification to your computer. Your computer’s hard drive is the place where cookies are usually stored. We use information collected from cookies in order to evaluate the effectiveness of our Site, administrate it, analyze trends, determine which parts of our Site are most visited and difficulties our visitors may experience in accessing it. Based on such collected information we are able to recognize and deliver to you the information and features tailored for your needs, and improve access difficulties, if any.

Furthermore, please kindly note that we use cookies and/or web bugs or clear gifs that are usually stored in emails in order to assist us with confirming your receipt of, and response to, our emails, as well as providing you with a more tailored experience when using the Site.

#### 1.4. Special categories of data

We do not collect any special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic, and biometric data).

#### 1.5. Children's personal data

Please note that our services are exclusively offered to individuals who are at least 18 years old. We do not process any Personal Information of children under this age.

### 2. Purposes for which we use and collect your Personal Information

If you wish to transact on and use the Site or use the Services, FoPayPro will collect information about you for the purposes set out below.

2.1. We may use and collect your Personal Information that you provide to us for the following purposes:

- 1) to allow you to open and operate an Account on the Platform;
- 2) to enable you to complete Transactions on the Platform;
- 3) process billing and collection of any fees;
- 4) develop, enhance, and market products and services, and provide products and services to you;
- 5) understand your needs and your eligibility for our products and services
- 6) if you contact us, to reply to your queries;
- 7) to analyze use of our Site;
- 8) as required for legal and regulatory purposes such as taxation, prevention of Money Laundering, prevention of Fraud, Terrorism Financing and other illegal activities, as well as adherence to fopaypro.com reporting obligations. It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us;
- 9) to provide you with information about products and Services, and promotions that may be of interest to you, from ourselves (including changes and enhancements to the Site) and third parties, although only if you have specifically agreed to receive such information;

10) for market research e.g. surveying our Users' needs and opinions on issues, such as our performance, etc. Unless consented, your data for this purpose would be anonymized;

11) provide you with news and other matters of general interest to you as a FoPayPro User.

## 2.2. Information we collect about you

FoPayPro uses information stated in clause 1.2. hereof to analyze trends, administer the Site, track customer movements, and gather broad demographic information for aggregate use. For systems administration and detecting usage patterns and troubleshooting purposes This information is not shared with third parties and is used only within FoPayPro on a need-to-know basis. FoPayPro reserves the right to block access for any customer accessing the Site via a proxy service intending to conceal originating identity. This includes access via the Tor anonymity network and alike technical environments.

## 3. Legal basis on which we process your Personal Information

### 3.1. We will process your Personal Information on the following grounds:

1) where it is necessary for us to perform pursuant to our contract with you or in your interests; and/or

2) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate interests mean the interests of our organization to conduct and manage our business to enable us to better serve you and provide you with a secure experience on the Site.

3.2. We ensure that we balance any potential impact on you and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

## 4. Disclosure of Personal Information

4.1. We use the Personal Information for the purposes indicated at the time you provide us with such information, and/or otherwise for the purposes set out in this Privacy Policy and/or as otherwise permitted by law.

4.2. We may make available the Personal Information that you provide to us for the limited purposes indicated for and during the provision of the Service that you would have requested in particular to:

1) Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries including their respective contractors, affiliates, employees or representatives;

2) payment service providers and financial institutions;

3) customer communications platforms;

4) our contractors providing software for identity verification purposes;

5) our contractors providing us information on sanctions lists from publicly accessible sources;

6) selected third parties, including analytics and search engine providers that assist us in the improvement and optimization of the Services;

4.3. We may also share Users' Personal Information with financial institutions, insurance companies or other companies in the case of a merger, divestiture, or other corporate re-organization and notify you of such sharing of your information to be able to exercise any of your rights where applicable. We may also share Users' Personal Information with law enforcement or regulatory agencies, as may be required by law. In certain cases, we may not be able to inform you of such sharing of data due to legal restrictions.

4.4. Any third party which receives or has access to Personal Information shall be required by us to protect such Personal Information and to use it only to carry out the services they are performing for you or for FoPayPro, unless otherwise required or permitted by law. Such third party, except for regulatory authorities, would be contractually bound to adhere to the same security and confidentiality policies as FoPayPro and assume the same responsibilities as FoPayPro.

4.5. The legitimate exercise of any of your rights with FoPayPro will also be notified to be applied by any such third parties having been given access to your Personal Information.

4.6. We will ensure that any such third party is aware of our obligations under this Privacy Policy and we will enter into contracts with such third parties by which they are bound by terms no less protective of any Personal Information disclosed to them than the obligations we undertake to you under this Privacy Policy or which are imposed on us under applicable data protection laws.

## 5. Security and confidentiality

5.1. FoPayPro is committed to protecting your privacy. Internally, only people with a business need to know Personal Information, or whose duties reasonably require access to it, are granted access to customers' Personal Information. Such individuals will only process your Personal Information on our instructions and are subject to a duty of confidentiality.

5.2. The Site's systems and data are reviewed periodically to ensure that you are getting a quality service and that leading security features are in place. We have put in place procedures to deal with any actual or suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 6. Retention of Personal Information

6.1. Your Personal Information will be stored in on remote servers in US and may be transferred worldwide. We will hold your Personal Information only for as long as it is necessary for the purposes described in this Privacy Policy and our own legal and regulatory requirements. Data stored for regulatory purposes only will be protected from unnecessary processing and will be held only for the purpose of being able to provide information or access to relevant authorities.

6.2. Personal Information and other data may therefore be exported outside of the jurisdiction in which you reside. Your Personal Information may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your Personal Information through foreign laws. You have to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside.

6.3. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. All data you provide to us is stored on a secure servers. Yet be kindly advised that unfortunately, the transmission of information via the Internet is not completely secure. While we do our utmost to protect your Personal Information, we cannot guarantee the security of your data transmitted to us over the email or through the Site; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access. Nevertheless, all data you provide to us is stored on a secure servers. Where we transfer our data internationally, we ensure that adequate safeguards are in place.

## 7. User's rights

7.1. We would like to make sure you are fully aware of all of your data protection rights. Our Users are entitled to the following:

1) The right to access – you have the right to request FoPayPro for copies of your personal data, yet please be advised that we may charge you a small fee for this service.

2) The right to rectification – you have the right to request that FoPayPro correct any information you believe is inaccurate. You also have the right to request FoPayPro to complete any information you believe is incomplete.

3) The right to erasure – you have the right to request that FoPayPro erase your Personal Information, under certain conditions.

4) The right to restrict processing – you have the right to request that FoPayPro restrict the processing of your Personal Information, under certain conditions.

5) The right to object to processing – you have the right to object to FoPayPro's processing of your Personal Information, under certain conditions.

6) The right to data portability – you have the right to request that FoPayPro transfer the data that we have collected to another organization, or directly to you, under certain conditions.

7.2. 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 you for further information in relation to your request to speed up our response.

7.3. We try to respond to all legitimate requests within one month. Occasionally it may take us a further two months 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. If you would like to exercise any of these rights, please contact us at:

Our email: [support@fopaypro.com](mailto:support@fopaypro.com)

## 8. Privacy policies of other websites

The Site contains links to other websites. Our Privacy Policy applies only to our Site, so if you click on a link to another website, you should read their privacy policy.

## 9. Changes to our Privacy Policy

9.1. FoPayPro keeps its Privacy Policy under regular review and places any updates on Site. If we consider that your rights may be affected by any such changes, we will request you to confirm your consideration and acceptance prior to continue our relationship with you. Please check back frequently to see any updates or changes to our Privacy Policy.

9.1. This Privacy Policy was last updated on 9.01.2021

## 10. Fraud, Phishing and Email scams disclaimer

10.1. Please be notified that FoPayPro is not in any partnership with entities who represent themselves as customer support agents, providing customer support services via phone and/or social media and promise to help solve your issues for money. Remember – customer support is provided only via the FoPayPro website and is always provided free of charge.

10.2. If you discovered what you believe is a fraud, phishing, or scam which impersonates FoPayPro, please email us at [support@fopaypro.com](mailto:support@fopaypro.com)

## 11. Contact Us

11.1. If you have any questions, comments, or concerns not specifically regarding our Privacy Policy and/or practices as it or they relate to the Platform, please contact us at the email address [support@fopaypro.com](mailto:support@fopaypro.com)