

Privacy Policy

INTRODUCTION

This Privacy Policy (“Policy”) clarifies how GeoCurrency Sp. z o. o. (hereinafter, “GeoCurrency“, “we”, “us”, “our”) collects, uses, shares, and protects Personal Information you provide us during the usage of pbpay.io website (the “Website”) or our products. It governs the rules of personal data processing of our clients, their partners representatives and all other Website visitors.

GeoCurrency commits to protect your privacy. We have implemented all necessary legal, technical and organizational measures to ensure confidentiality, integrity and availability of your Personal Information.

Under “Personal Information” or “Personal Data” we mean any data you can be identified with or which may help to identify you.

The General Data Protection Regulation 2016/679 as of April 27, 2016 (further, the “GDPR”) applies to processing of Personal Information by GeoCurrency.

OUR CONTACT DETAILS

All references to “GeoCurrency”, “us”, “we” or “our” apply to GeoCurrency Sp. z o. o., a company incorporated under the laws of the Republic of Poland with the registration number 0000960924.

GeoCurrency is an authorized virtual currency service provider (License No RDWW-185) by the Fiscal Administration Chamber in Katowice, Poland. Our registered office is at: Katowice, Jana Kochanowskiego 12A/4 Street, 40- 035 Katowice, Poland.

For all the issues related to data protection please contact us at: compliance@pbpay.io

WHAT TYPE OF PERSONAL INFORMATION WE COLLECT

The types of Personal Information we may collect include:

- Contact details (email, telephone number or messenger ID)
- Details of your identity document
- Residence address
- Financial information
- Employment details
- Geolocation details
- History of your logs and activity on the Website
- IP address, browser and operating system information, device fingerprint.

Most information we collect is provided by you directly. We could also receive some information from publicly available sources (for example, on sanctions) or from our contractors. We make use of screening lists provided by data vendors, ID verification, anti-fraud and transaction monitoring services.

Please note that we will not be able to provide our services to you if you refuse to provide us information according to our KYC/AML requirements communicated to you once you decide to apply for any of our services that require verification of identity and ongoing monitoring of activity. Please keep in mind that in some cases we may require additional details and documents for KYC and AML/CTF purposes.

Please note that processing of your Personal Data may include automated decision-making including profiling. We may apply automated decision-making including profiling for onboarding, maintaining the account with us and fraud prevention purposes.

HOW WE GET THE INFORMATION AND WHY WE HAVE IT

We process our clients' data for the following purposes:

- to provide our services to you, as individual, or a corporate client you represent;
- to contact you or reply to your requests;
- to comply with our legal obligations (e.g. KYC/AML requirements);
- to provide assistance in case of criminal investigation and regulatory action;
- to protect your assets from unauthorized access;
- to prevent any fraud and scam activity;
- to provide you information on our products, news and updates;
- to resolve disputes and protect your interests or interests of other users.

Under the GDPR, the lawful bases we rely on for processing this information are:

- Your consent. You are able to withdraw your consent at any time by contacting us at compliance@pbpay.io;
- We have a contractual obligation;
- We have a legal obligation to comply with AML/CTF requirements under the applicable laws and regulations, keep records for tax purposes;
- We have a legitimate interest in providing the necessary updates regarding our services, prevent any fraudulent activity proactively and retrospectively, and contacting employees of our clients and business partners.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share this information with:

- our affiliates, agents and representatives;
- our contractors providing software for identity verification and anti-fraud purposes;
- our contractors providing us information from publicly accessible sources (for instance on sanctions);
- our financial service providers through which we facilitate fiat currency transactions to/from our services;
- law enforcement or regulatory agencies if required or permitted by law.

INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

We may transfer your Personal Information outside of the European Economic Area only in the following cases:

- if the country where we transfer your Personal Information to provides adequate level of personal data protection (based on the relevant decision of European Commission);
- if we take appropriate safeguards to ensure that your rights as a data subject are protected (e.g., conclude standard contractual clauses or ask for your consent for such transfer);
- if any derogations for specific situations apply (for instance, if such transfer is necessary for the establishment, exercise or defence of legal claims or for important reason of public interest).

PERSONAL DATA RETENTION

We will ensure that any information we need for any purpose shall not be kept for longer than it is necessary. We retain your personal data just to comply with our legal obligations, resolve disputes, and protect your and our legitimate interests.

We will keep your Personal Information for a maximum period of seven (7) years upon termination of legal relationships with us.

You can always request to remove the personal data. But keep in mind that in certain cases we are obliged to store your information to be legally compliant.

Your Rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information.
- Your right to object to processing - You have the right to object to the processing of your personal data.
- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organization, or to you.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at compliance@pbpay.io if you wish to make a request.

Please note that in some cases we will not be able to fulfill your request due to our legal obligations or overriding legitimate interest. In such cases we will explain to you the reasons why your request cannot be fulfilled and how you can complain.

SECURITY

GeoCurrency has implemented security measures to comply with acknowledged international security standards. Our platform also uses SSL or TLS encryption for security reasons and for the protection of confidential content transmission when you send us requests.

OUR DATA PROTECTION AUTHORITY

Our Data Protection Supervisory Authority is Polish [UODO](https://uodo.gov.pl). You can complain to UPDO if you are unhappy with our data protection practices.

The address of UODOe is:

Urząd Ochrony Danych Osobowych

ul. Stawki 2, 00-193 Warszawa

kancelaria@uodo.gov.pl

Website: <https://uodo.gov.pl/en>

POLICY CHANGES

GeoCurrency may introduce amendments to the current Policy at any time. We shall notify you on our Website or via E-mail Newsletters.