

PRIVACY STATEMENT FOR VENDORS AND OTHER BUSINESS PARTNERS

I. General

C2D Payment Solutions Ltd. of Portomaso Business Tower, St Julian's, STJ 4011, MALTA (hereinafter "C2D") is committed to the protection of personal data of customers, suppliers and other partners. This privacy statement applies to the processing of personal data of suppliers and other business partners (including Acceptance Partners).

Personal data refers to data concerning the personal or material circumstances of an identified or identifiable individual. This may include amongst others a person's name, address, telephone number and date of birth, but also a copy of your ID card or financial data. For the purposes of this Privacy Statement, when we refer to your personal data, this includes all personal data, including employee data, shareholder data, data of subcontractors and their employees, or any other data of a personal nature which you transfer to us.

This Privacy Statement provides details on whether your personal data is collected, processed and retained by C2D and how this is done. Whenever C2D collects, processes and retains your personal data, C2D will act as data controller, unless otherwise indicated at the time of data collection or processing. Our data protection practices comply with all applicable data protection legislation, including the provisions of the European General Data Protection Regulation, and any other European or national legislation we may be subject to. This Privacy Statement may be subject to modification from time to time, notably in the event of changes to legislation, the introduction of new laws or revision or expansion of our services. Any changes will be published on our website and notified to you as soon as possible.

II. How C2D uses and retains your data

We shall only collect and use your personal data to comply with a legal obligation which we are subject to (e.g. verification obligation), if we obtain your consent to do so, or if we feel we have a legitimate interest to process the data that is not detrimental to your right to privacy as a data subject.

Your personal data will be treated as strictly confidential. We shall only retain your personal data for the length of time necessary for the intended purpose of data collection, or for as long as legally required.

III. To whom C2D may transfer your data

Your personal data will not be forwarded to a third party unless expressly stipulated in the terms of this Privacy Statement.

Your personal data may be shared with other companies within the same group of companies which C2D forms part of. We may also share personal data with third party service providers with whom C2D has a contractual relationship and who provide part of the services requested by you on behalf of C2D ("Data Processors"). In addition, we may also be required to share your personal data with authorities or other competent bodies as a result of a legal obligation to which we are subject, to detect or prevent fraud or to safeguard the interests of C2D's personnel.

Where we share your personal data with third parties, we shall take all reasonable precautions to ensure that these third parties respect the same privacy standards as C2D.

We only transfer data to states outside the European Economic Area provided the recipient guarantees a standard of data protection comparable to that in place in Europe, or where adequate safeguards are put in place.

IV. KYC and credit score checks

If we are legally obliged to do so or have a legitimate interest, we request Due Diligence or KYC documents from you and process them.

C2D also reserves the right to consult due diligence risk information service providers. Such companies can save the request themselves and save the circumstance of the request and process it for their own purposes as separate data controllers. C2D will only consult such providers who guarantee an appropriate level of data protection. Further details can be obtained from the respective providers. The data C2D receives from them will serve as a basis for our decision on whether to establish, conduct or terminate the contractual relationship. C2D does not currently use any such providers, however this section of the Privacy Statement shall be updated accordingly should this change in the future.

V. Your rights

Any data subject has the right to:

- request a copy of their personal data;
- rectify their personal data;
- request erasure of their personal data;
- request the restriction of processing of their personal data;
- object to the processing of their personal data;
- withdraw their consent at any times;
- receive their personal data in a structured, commonly used and machine-readable format and/or have it transmitted to another data controller.

All requests, complaints or queries may be addressed to C2D to the email-address mentioned in section VII. We will consider any requests, complaints or queries and provide you with a reply in a timely manner. You can also file a complaint with the competent Data Protection Authority should you not be satisfied with the way in which we handle your personal data.

VI. Data security

Technical and organisational measures are used to protect your personal data from unauthorized access by third parties, disclosure, alteration, destruction or loss during its collection, processing and retention. This level of protection cannot, however, be extended to communication by email and we recommend that you send all confidential data by registered post.

VII. Contact for matters of data protection

For any privacy issues you may have or to obtain further data on our data processing activities, please contact our Data Protection Officer at:

C2D Payment Solutions Ltd.
Portomaso Business Tower
STJ 4011, St. Julian's, Malta
Email: dpo@c2dpayment.com

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