

Privacy Policy

This Privacy Policy, together with the Terms and Conditions and other material parts thereof, governs the collection, processing and use of your Personal Data by CLOUDZONE PAYMENT INC. (CLOUDZONE) is a data controller in accordance with this Privacy Policy, which governs how the company, as a data controller, may use your Personal Data.

CLOUDZONE and its affiliates are committed to doing their best to protect your privacy. CLOUDZONE uses the information collected about you to fulfill its contractual obligations and improve customer service.

Please read this document carefully to understand our approach and policy regarding your Personal Data and how we will use your Personal Data.

1. WHAT DATA WE COLLECT ON YOU

We may collect and process the following data about you:

Information you provide to us

You may provide us with information about yourself by completing the appropriate forms on the Website or by providing us with such information by phone, email, video conference or any other means. This information includes the Personal Data specified when registering on the Site, when subscribing to our Service, opening an Account and verifying the identity of the Account holder or persons authorized to use it, as well as payment instruments used by a person, when searching for a product, using any of Services provided by our Site, when placing Orders on our Site, when participating in Chat discussions or using any other communication features on our Site, when participating in sweepstakes, promotions or surveys, or when reporting problems or questions to us about the operation of the Site .

For example, the data you provide may include your:

- surname and name;
- photographs and videos that you may send to us for the purposes of the AML / CFT Policy during the course of the verification process;
- residential address and citizenship;
- passport, driver's license or any other form of identification issued by a government agency;
- tax residency;
- phone number and email address;
- information about the login and pseudonym that is used to access the CLOUDZONE platform;

- bank details, including account numbers and payment details, as well as information under the Foreign Account Taxation Act (FATCA/CRS);
- date and place of birth;
- education;
- work experience and place of work;
- PEP status (political officials) ;
- sources and amount of income and/or account replenishment;
- information about the status of your accounts opened with banks and/or payment systems;
- CLOUDZONE-enabled queries;
- balance sheets and trading activities;
- location information and records of your activities resulting from your use of the CLOUDZONE-enabled queries platform;
- other personal information as may be required in accordance with our obligations to comply with the requirements of the Anti-Money Laundering and Countering the Financing of Terrorism Policy.

CLOUDZONE does not collect or process such sensitive personal data of Users as their racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, information about health, sexual life or sexual orientation. However, we warn you that if you disclose any information in the public Chat on our site, it may be collected by persons or companies over which CLOUDZONE has no control.

Information we collect about you

Each time you visit our Website and use our Service, we may collect the following information about you (including the automatic collection of such information), for example:

- technical information, including the internet protocol (IP) address used to connect your computer to the internet, your Account login information, your browser type and version, time zone settings, browser plug-in types and versions, operating system and platform ;
- information about your visit, including the full flow of Uniform Resource Access Identifier (URL) clicks to, through and from our Website (including date and time); the products and Services that you browsed or searched for; page response times, loading errors, duration of visits to certain pages, page interaction information (such as scrolling, clicks, and hover), as well as the methods used to navigate away from the page, and any phone number used to call our service customer support;
- geolocation information: we may collect real-time location information based on data from your device at any time while you download or use our services; we may use this information to optimize your experience.
- financial data and information about the use of the Services provided by our Site, including information about the transactions performed and their participants, including transactions, information about the status of Accounts and the movement of funds on them, accrued commissions, information about replenishment of Accounts and withdrawals from Accounts opened on our Platform.

Information we receive from other sources

We may receive information about you if you use our other websites or other services we provide. We also work closely with third parties (including, for example, business partners, technical, payment and courier service subcontractors, advertising networks, analytics providers, due diligence providers, credit scoring agencies) and may receive information about you from them. Such information may include:

1. information about the financial institutions you use to deposit and/or withdraw funds;
2. confirmation by credit agencies of the information you have provided to us;
3. information about your financial situation, name and / or address, which may be provided to us by third parties with whom we cooperate.

Your personal data, such as email and nickname, which you provide to us during registration on the CLOUDZONE platform and which are stored by us, regardless of whether your registration process is completed or not. The same applies to your Personal Data during the pending verification process under the AML/KYC Policies .

2. USE OF COOKIES

Please see our Cookie Policy for information on our use of cookies and to manage your consent to such use.

3. WHY WE USE YOUR PERSONAL DATA

We will use your Personal Data for the following purposes:

Providing our Services

- to fulfill our obligations under our contracts with you and to provide you with the information, products and Services you have requested;
- to maintain the security of our Website, our Service and your Account;
- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, collecting statistics and conducting surveys;
- provide you with access to interactive features of the Website in case you choose to use them;
- to support, respond to and resolve your complaints and questions related to your use of our Services and features of our Website.

Providing you with information about our products and Services,

- to notify you of other existing and/or new products and Services similar to those products or Services you have already purchased or information you have searched for;
- notify you of changes to our products and Services.

Help us improve our products and Services

- to improve our Site and to ensure that our content is the most convenient for your computer's operating system;
- to evaluate and understand the effectiveness of advertising materials that we provide to you and other Users, as well as to provide you with the necessary advertising information;

- to ensure that the content of our Website is presented to you in the most efficient way and that you can use it on your computer.

Protecting the interests entrusted to us

- for risk management;
- to maintain the security and control of our IT systems, crime prevention;
- to evaluate the use of our Services and products for their further development and development;
- to achieve internal business and research goals, i.e. to contact you regarding our products and Services;
- to analyze anonymous data using web beacons and pixel tags to ensure that our products and Services are relevant to the market in which we operate.

Ensuring legal procedures

- to respond to law enforcement requests;
- in order to initiate legal actions and / or develop retaliatory measures to claims;
- to research and/or resolve disputes with you.

Compliance

- to verify and verify the identity of Users who open and use Accounts in order to prevent fraud and related illegal activities;
- to comply with the legal requirements of our AML/CFT Policies, as well as other relevant laws and regulations;
- to notify our Users of changes to the policies and terms of use of the CLOUDZONE platform.

Marketing and third parties

- to provide you with information about new products or services CLOUDZONE or third party providers that we think may be of interest to you; if you are already a User, we will contact you electronically (via email or SMS) to inform you of products or services similar to those that have been the subject of offers or promotions in the past; if you are a new User, we will ask for your consent to share your Personal Data with other service providers to offer products and services.

4. DISCLOSURE OF YOUR PERSONAL DATA

We may share your personal information within CLOUDZONE group that includes our subsidiaries, affiliates, our parent holding company and its subsidiaries.

We may share your information with certain third parties, including:

- business partners, suppliers, subcontractors, service providers who perform appropriate credit and due diligence checks to fulfill contractual obligations we enter into with them or with you;
- marketing networks that require certain data to select and promote relevant ads; we do not disclose confidential information about our customers to marketing companies, but we may provide them with aggregated information about our

Users ; we may also use such aggregated information to help marketing companies reach the audience they wish to target; we may use the Personal Data we collect from you to enable us to fulfill the wishes of our advertisers by showing their ads to specific target audiences;

- analytics and search engine service providers that help us improve and optimize our Website.

We may also disclose your Personal Data to third parties in the following cases:

- if we sell or buy any business or assets; personal data of Users may be disclosed to a potential buyer or seller;
- if CLOUDZONE or all of its assets are acquired by a third party, then the personal data of users will be transferred as one of the types of assets;
- if we are under an obligation to disclose or transfer User Personal Data in accordance with any applicable law or as part of the execution of decisions of relevant courts, requests from judicial and law enforcement agencies, or we are forced to force Users to comply with the terms of agreements signed with us;
- in case it is necessary to protect our rights, property or for the safety of CLOUDZONE, our Users or others; this includes exchanging information with relevant organizations to prevent fraud and reduce the likelihood of default.

5. SECURITY AND RETENTION OF PERSONAL DATA

We have put in place security measures to keep your Personal Data private and secure from loss, misuse, alteration or destruction. Only authorized CLOUDZONE personnel has access to your Personal Data and such persons are required to treat such information as confidential. The current security measures will be reviewed from time to time in accordance with legal and technical changes.

The information we collect from you may be transferred to and stored outside of the Republic of Poland and/or the European Economic Area (“EEA”) for the purpose of providing our Services to you. Information about you may be processed by our employees or employees of service providers outside the Republic of Poland and/or the EEA. When third parties store or otherwise process your Personal Data outside of the above territories, we will ensure that we notify such third parties of our obligations under this Privacy Policy and enter into a relationship with them that imposes obligations on them with respect to your Personal Data, provided that they have the appropriate level of security specified in this Privacy Policy. Such employees may, among other things, process your inquiries, payment details and provide technical support. By providing us with your Personal Data, you consent to the transfer, storage and processing of your Personal Data. In turn, we will take all necessary measures to ensure that your Personal Data is processed in accordance with international security standards and in accordance with the provisions of this Privacy Policy.

Although the transmission of information over the Internet is not completely secure, we will take all measures to protect your Personal Data. However, we cannot guarantee the security of the channels you will use to transmit your personal information to our Site. Therefore, you are solely responsible for possible failures in the transmission of your Personal Data to the Website. Once we receive your Personal Data, we will use strict procedures and all necessary technical and security measures to prevent unauthorized access to your Personal Data.

6. BASIS FOR PROCESSING PERSONAL DATA

We collect and process your Personal Data only if we have a legitimate basis for such processing. Legal grounds may include:

- your consent;
- agreement where the processing is necessary to fulfill the terms of an agreement between you and CLOUDZONE;
- compliance with legal obligations, where CLOUDZONE is required to request/receive and process and store your Personal Data in order to comply with the requirements of applicable law, for example, laws related to combating money laundering and the financing of terrorism;
- to protect legitimate interests, for example, when data processing is necessary to protect you or us from certain threats, such as fraud, security risks, etc.;
- compliance with the provisions of applicable law in order to carry out our activities (quality of services provided, identification of needs, preparation of reports) in accordance with regulatory requirements;
- implementation of corporate transactions (sale of shares / shares of participants, mergers, acquisitions), etc.

In cases where the basis for the processing of personal data is your consent, you have the right to withdraw it at any time.

7. YOUR RIGHTS

By contacting us, you can exercise the following rights:

- the right to delete your Personal Data (in whole or in part, while taking into account our regulatory requirements for the storage of personal data set out in clause 9 of this Privacy Policy);
- the right to change or correct your Personal Data, in particular if it is incorrect;
- the right to object to or restrict the processing of your Personal Data;
- the right to access your Personal Data and/or the right to obtain a copy of your Personal Data that you have provided to CLOUDZONE in machine readable format.

In addition, you have the right to object to the use of your data for marketing purposes. Before we ask for your Data, we usually ask for your consent to disclose it to third parties for marketing purposes. You can exercise the right to object to the processing of your Data for marketing purposes by ticking the appropriate box on the questionnaire. You can also exercise this right by contacting us at any time.

Please note that the exercise of some of your rights, depending on the situation, may limit, complicate or completely exclude the possibility of further cooperation with us.

Our website may contain active links to/from the websites of our partners, advertisers and affiliates. If you follow an active link, please note that other sites have their own privacy policies and we are not responsible for the provisions of such policies. Please read the privacy policies of these sites before submitting your personal information to them.

8. ACCESS TO PERSONAL DATA

The General Data Protection Regulation (EU) (2016/679) (“GDPR”) gives you the right to access the information we hold about you. Your right of access may be exercised under the Data Protection Act 2018 and if you send us a written request to info@cloudzone.ca we will provide you with stored data relating to you. In the event that your request is manifestly unfounded or excessive, or if you request additional copies of your Personal Data after your initial request, we may charge you a fee of 50,00 Euro (fifty Euro) for our services.

9. STORAGE OF PERSONAL DATA

Ensuring the safety and security of your personal data is a top priority for us. We use secure repositories to ensure the safety of your Personal Data that you provide to us at all stages of interaction with our Platform using our products and Services. All necessary measures to protect your personal data from possible hacker attacks, loss or misuse are carried out by our security team.

We will only retain your Personal Data for the duration of your use of our products and Services through your Account, subject to the purposes described in this Privacy Policy and the legal and regulatory obligations we are subject to. In accordance with our record keeping obligations, we will retain your Account information and your Personal Data for a minimum of five (5) years from the date you terminate your use of our Services or your customer relationship with us, unless otherwise required by law.

We may access or store your Personal Data for a longer period if it is the subject of a formal request or legal obligation, a government investigation or an investigation into possible violations of our Terms of Service and material portions thereof, or in other cases to prevent possible damages based on our reasonable opinion.

If you unsubscribe from our email newsletter, we will store your email address in an inactive email address list.

10. CHANGES TO THIS PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notice will be sent to you by email. We encourage you to check this page frequently for any updates or changes to the Privacy Policy.