



## ZASTRPAY DATA PRIVACY POLICY

### I. GENERAL

### II. WHAT INFORMATION DOES ZASTRPAY COLLECT?

### III. WHAT DOES ZASTRPAY USE YOUR INFORMATION FOR?

### IV. WITH WHOM DOES ZASTRPAY SHARE YOUR INFORMATION?

### V. HOW DOES ZASTRPAY PROTECT YOUR INFORMATION?

### VI. WHAT ARE YOUR DATA PROTECTION RIGHTS?

### VII. EXTERNAL CONTENT AND COOKIES

### VIII. FURTHER INFORMATION AND CONTACT DETAILS OF OUR DATA PROTECTION OFFICER

#### **I. GENERAL**

1. C2D Payment Solutions Ltd, 6<sup>th</sup> Floor, Portomaso Business Tower, STJ 4011 St. Julian's, Malta (hereinafter under its registered trademark "**Zastrpay**", "**us**", "**our**", "**we**") is committed to user privacy. This Privacy Policy provides details on how your personal information is collected, processed, shared, transferred and retained by Zastrpay when opening and using a Zastrpay Account through one of our Acceptance Partners.
2. This Privacy Policy must be read together with and is considered to form an integral part of our Zastrpay Terms of Use. All terms defined in the Terms of Use shall have the same meaning in this Privacy Policy. By continuing to use the services offered via Zastrpay after being provided with access to this Privacy Policy, you acknowledge to have read and understood the terms of this Privacy Policy and to the use of your personal information in accordance with these terms.
3. Zastrpay's data processing activities comply with all applicable data protection legislation, including the provisions of the General Data Protection Regulation 2016/679 (hereinafter "**GDPR**"), and any other European or national legislation we may be subject to.
4. Zastrpay will act as data controller in relation to the data processing activities envisaged in this Privacy Policy. The Acceptance Partner will act as data controller in its own right in relation to the processing activities it is obliged to undertake under national anti-money laundering legislation.
5. This Privacy Policy 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 offering. Any changes to this Privacy Policy will be published on the Zastrpay website <http://www.zastrpay.com/> as well as displayed in all distribution partners' shops.

#### **II. WHAT INFORMATION DOES ZASTRPAY COLLECT?**

*Zastrpay® is a registered trademark of C2D Payment Solutions Ltd, with company registration number C 91485, which is authorised and regulated by the Malta Financial Services Authority as an Electronic Money Institution under the Financial Institutions Act 1994 (Cap. 376).*

1. During our business relationship with you, we collect following personal information from you:
  - a) **Registration information:** Upon registration you are asked to provide the following information: your first name(s) and surname, your place and date of birth, your nationality, your residential address and the type, number and issuing authority of your identification document. Upon registration, the Acceptance Partner shall also make a copy of your identification document. If your identification document does not show your residential address, our Acceptance Partner also asks for your proof of address (e.g. a utility bill). Zastrpay and the Acceptance Partner are required by law to collect this information, particularly to comply with legal obligations to prevent money laundering (e.g. KYC) and to combat fraud. You will also be required to provide us with either your mobile phone number or your email address (or both the mobile phone number and email address, in case you use the QR-code within our app). This information is used to provide you with contractual information and may further be used to safely set up your Zastrpay Account and to allow you to make use of our services.
  - b) **Authentication information:** During the opening of your Zastrpay Account, we will provide you with or request you to set up your Account Access Identifiers (e.g. credentials and password), which will help us and/or our Acceptance Partners to verify your identity every time you wish to use your Zastrpay Account.
  - c) **Transactional information:** In order to provide you with our Zastrpay services, as well as for compliance with our legal obligations, we keep a record of all (e-money) transactions carried out via your Zastrpay Account. This includes, without being limited to, the amounts loaded or withdrawn, the transfer orders issued, the merchants you interacted with, the history of transactions and the funding instruments used.
  - d) **Identification verification information:** For the entire duration of our business relationship Zastrpay and the Acceptance Partner are bound by law to carry out certain due diligence checks and verification processes, amongst others to prevent money laundering. These checks may include, without being limited to, identity checks and checks on the source of wealth and source of funds. We may, at our own discretion on the basis of a legal obligation, decide which additional information we require from you in this respect. This may include, without being limited to, following information: the information and documentation referenced in Section II.1.a) above, as well as information and/or documentation relating to your source of wealth and source of funds as well as IP addresses when accessing the Zastrpay website as well as racial or ethnic origin. We may also use third party databases to confirm such information and/or outsource the verification process to a third-party Verification Provider. The results of such checks, as well as any documentation you provide to us in the respect, will be stored in our systems during the term of our business relationship and for up to ten (10) years thereafter.
  - e) **Additional verification information:** It may be in our legitimate interest to carry out certain checks, both internally or through third parties, for the purpose of assessing potential breaches of our Terms of Use and/or the Applicable Rules. We may, at our own discretion, decide which additional information we ask from you in this respect, provided that your rights to the protection of your personal data are not disproportionately harmed.
  - f) **Contact information:** Where you use our Zastrpay Website contact form or contact our Customer Service, we will process your contact details (e.g. mail address and/or mobile phone number), as well as any personal data relevant to your query, in order to respond to your query. Provided you have given us your consent thereto or we would otherwise be entitled to do so, we may use your contact details to send you electronic marketing messages and/or newsletters.
2. The abovementioned information may be collected by us directly or on our behalf by one of our Acceptance Partners (e.g. upon registration), who will immediately transfer such information to Zastrpay. If registration or authentication is carried out using ID Austria, the respective data is provided via ID Austria. The controller for ID Austria is the Austrian Federal Chancellery, Department VII.
3. Failure to provide any of the abovementioned information may result in Zastrpay and/or the Acceptance Partner not being able to perform the requested services, in particular where there is a legal obligation to collect such information before being able to provide you with the Zastrpay services. In addition, where the verification information received from you or from one of our Verification Providers does not prove to be satisfying, we may at our own discretion decide to not establish or terminate our contractual relationship with you.

*Zastrpay® is a registered trademark of C2D Payment Solutions Ltd, with company registration number C 91485, which is authorised and regulated by the Malta Financial Services Authority as an Electronic Money Institution under the Financial Institutions Act 1994 (Cap. 376).*



### III. WHAT DOES ZASTRPAY USE YOUR INFORMATION FOR?

1. Your information shall be processed by Zastrpay and/or the Acceptance Partner for the following purposes:
  - a) When needed to be able to perform the Zastrpay services or any additional services you have requested (Art 6 para 1 (b) GDPR), including to:
    - Set-up your Zastrpay Account;
    - Authenticate the access to your Zastrpay Account;
    - Process e-money transactions via your Zastrpay Account;
    - Communicate to you in relation to your Zastrpay Account and/or any query you address to us.
  - b) To comply with legal obligations (Art 6 para 1 (c) GDPR, e.g. identification and verification obligation to prevent money laundering or to combat fraud);
  - c) When you have consented thereto (Art 6 para 1 (a) GDPR), e.g. for sending electronic marketing messages); or
  - d) If we have determined a legitimate interest (Art 6 para 1 (f) GDPR) to do so that is not detrimental to your right to data protection, including to:
    - Manage our business needs, analyse and manage risks, improve our services and enhance the functionality of our Zastrpay Website;
    - Evaluate breaches of our Terms of Use and/or the Applicable Rules;
    - Send marketing messages which do not require consent.
2. Zastrpay and/or the Acceptance Partner shall retain your data for the length of time necessary for the intended purpose of data processing or for as long as legally required (e.g. identification verification information must be retained for at least 5 years following the end of the business relationship). We may retain data for longer if this would be in our legitimate business interest or necessary for the establishment, exercise or defence of legal claims and not prohibited by law.

### IV. WITH WHOM DOES ZASTRPAY SHARE YOUR INFORMATION?

1. Your personal information will not be forwarded to or shared with a third party unless expressly stipulated in the terms of this Privacy Policy or unless you have consented thereto.
2. Zastrpay will share your personal information with its Acceptance Partners and with merchants accepting e-money issued by Zastrpay as payment method, as well as with its advisors, agents, or contractors working on behalf of Zastrpay, provided they would have a need to know such information (e.g. to allow the Acceptance Partners to perform Authentication). Zastrpay may also share personal information with third party service providers, including Verification Providers, with whom Zastrpay has a contractual relationship and who provide certain services or verification processes on behalf of Zastrpay and/or help Zastrpay comply with any of its legal obligations or securing its legitimate interests. In addition, Zastrpay and/or the Acceptance Partner may 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, to defend the public interest or to safeguard the interests of Zastrpay's personnel.
3. Zastrpay currently works with the following Verification Providers and/or third-party service providers:
  - Moody's Analytics UK Limited, One Canada Square, Canary Wharf, London, E14 5FA, United Kingdom;
  - IDnow GmbH, Auenstrasse 100, 80469, Munich, Germany;
  - Braze, Inc., 63 Madison Building, 28 East 28th Street, Floor 12, New York, NY 10016, USA;
  - Zastrpay transfers personal data collected within the scope of the instant contract related to the application for, performance or termination of this business relationship to SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden. The legal bases for such transmission comprise Art. 6 (1) (b) and Art. 6 (1) (f) GDPR. Data may only be transmitted on the basis of Art. 6 (1) (f) GDPR to the extent necessary for the purposes safeguarding the legitimate interests pursued of Zastrpay or third parties and such interests are not overridden by the interests or fundamental rights and freedoms of the

*Zastrpay® is a registered trademark of C2D Payment Solutions Ltd, with company registration number C 91485, which is authorised and regulated by the Malta Financial Services Authority as an Electronic Money Institution under the Financial Institutions Act 1994 (Cap. 376).*

data subject which require protection of personal data. Data transmitted to SCHUFA is also used for identity verification. SCHUFA processes data and also uses such data for purposes of profile creation (Scoring) in order to provide its contractual partners domiciled in the European Economic Area and Switzerland as well third countries as applicable (to the extent an adequacy decision from the European Commission is available for such countries) information to be used to evaluate the creditworthiness of natural persons amongst other things. Additional information regarding SCHUFA's business may be found in the SCHUFA Information Sheet pursuant to Art. 14 GDPR or online at [www.schufa.de/datenschutz](http://www.schufa.de/datenschutz).

Unless specifically provided otherwise in the respective privacy policies of the Verification Providers, the Verification Providers shall act as (separate) data controllers with respect to the personal information transferred to them by Zastrpay. We advise you to consult the respective privacy policies for more information on the way in which these Verification Providers process your personal data.

The information we receive from the Verification Providers may serve as a basis for our decision on whether to establish, conduct or terminate the contractual relationship with you. No automated decision-making according to Art 22 GDPR shall take place.

4. Where we share your personal information with third parties, we shall take all reasonable precautions to ensure that these third parties respect the same privacy standards as Zastrpay does under this Privacy Policy.
5. We have put the necessary measures in place to ensure that any transfer of your personal information to countries outside the European Economic Area are accompanied by the required additional safeguards. In this respect, we may, for example rely on an adequacy decision of the European Commission or, in case such a decision is missing for the relevant jurisdiction, on Standard Contractual Clauses. These are accessible upon request.

## **V. HOW DOES ZASTRPAY PROTECT YOUR INFORMATION?**

1. Appropriate technical and organisational measures are used to protect your personal information from unauthorized access by third parties, disclosure, alteration, misuse, destruction or loss during its collection, processing and retention. These measures include, amongst others, data encryption, firewalls, physical and electronic access controls, etc. We also implement all necessary measures to ensure confidentiality of your personal information. This includes imposing appropriate confidentiality obligations on our employees, Acceptance Partners, advisors, agents or contractors. This level of protection can, however, not be extended to communication by email and we recommend that you send all confidential information by registered post.
2. You are responsible for the security and confidentiality of your Account Access Identifiers, your email account and your mobile phone number. In this respect, you shall only use strong passwords and update them regularly. You are also responsible for communicating any changes to your personal information to Zastrpay immediately.

## **VI. WHAT ARE YOUR DATA PROTECTION RIGHTS?**

1. Subject to the limitations set out in the applicable data protection legislation, as a data subject, you are granted a number of rights in relation to your personal information. These rights include the right to:
  - a) Request access to, information on or a copy of your personal data;
  - b) Rectify your personal data;
  - c) Request erasure of your personal data;
  - d) Request the restriction of processing of your personal data;
  - e) Object to the processing of your personal data;
  - f) Withdraw your consent at all times (the withdrawal of your consent does not affect the lawfulness of processing based on your consent prior to its withdrawal);
  - g) Receive your personal data in a structured, commonly used and machine-readable format and/or have it transmitted to another data controller (data portability);

*Zastrpay® is a registered trademark of C2D Payment Solutions Ltd, with company registration number C 91485, which is authorised and regulated by the Malta Financial Services Authority as an Electronic Money Institution under the Financial Institutions Act 1994 (Cap. 376).*

- h) Lodge a complaint with the competent supervisory authority (see below VI.2.).
2. All requests, complaints or queries may be addressed to Zastrpay to the email address mentioned in section [VIII](#). We will consider any requests, complaints or queries and provide you with a reply in a timely manner. If we are unable to provide you with a reply within the required timeframe, we will provide you with a date by when the information will be provided to you. If a request cannot be carried out for any reasons, we will inform you accordingly. You can also file a complaint with the Maltese Information and Data Protection Commissioner ([idpc.info@idpc.org.mt](mailto:idpc.info@idpc.org.mt)) should you not be satisfied with the way in which we handle your personal information.

## VII. EXTERNAL CONTENT AND COOKIES

1. We use active JavaScript contents from external providers on our websites. When you access our site, these external providers may receive personal information relating to your visit to our websites. It is possible that this data is processed outside of the EU. You can prevent this by installing a JavaScript blocker such as the browser plugin 'NoScript' ([www.noscript.net](http://www.noscript.net)) or by disabling JavaScript in your browser. However, please note that if you do so, you may not be able to use the full functionality of the websites you visit. Please also note that Zastrpay cannot accept any responsibility for external content.
2. We also use cookies on our websites, in our applications and in our newsletters to make them more attractive to users, to enable the use of certain functions, to improve our website, applications and newsletters or to perform certain statistical analysis. So-called 'cookies' are small text files which your browser can place on your computer or mobile device and which may contain certain (personal) information (e.g. IP address, your operating system/terminal settings, website from which file was accessed, name of file, date and time of retrieval, volume of data transmitted, notification of whether data retrieval was successful (so-called web log)). The process of placing a cookie file is also known as 'setting a cookie'.
3. You can modify your browser settings to notify you when a cookie is set, to accept them on a case-by-case basis, or to accept or reject the use of certain cookies. We recommend that you accept the cookies that we set on our websites, applications and newsletters to get the best out of their functions.
4. The following types of cookies may be used by us on the website:
  - a) **Essential cookies:** These cookies are essential to make the website work correctly. These cookies don't collect personal information.
  - b) **Functionality and Performance cookies:** Performance cookies monitor behaviour on our websites and applications, which allows us to improve their performance. These cookies don't collect personal information, but only data that are anonymised or aggregate. Functionality cookies enable previous choices of users to be remembered (e.g. username, language). They help improve the user's experience and allow your experience to be personalised. The information these cookies collect may include personal information. The legal basis for processing this data is your consent. If you do not accept these cookies, it may affect the functionality and may restrict access to content on the website.
5. First Party Cookies are cookies set on your device by Zastrpay directly to allow us to deliver our services to you. All of the first party cookies are essential cookies, and are generally used for the following purposes:
  - a) To determine where the website traffic originated from (including any platform and/or websites);
  - b) For the general functionality of our website, particularly to ensure that all our website features work correctly (including, amongst others, language preferences, consent preferences, etc);
  - c) To measure our website's performance;
  - d) For general testing purposes (also to ensure performance and functionality of the website);
  - e) Any other purposes as may be necessary and deemed essential from time-to-time.
6. Third Party Cookies are cookies set on your device by third party service providers to allow them to deliver their services to you. The setting of these cookies is regulated by the cookie policies of the respective third parties. Currently, we use the following plugins and active script contents from third-party providers on this website. Zastrpay reserves the right to use additional plugins and script contents at any time:

*Zastrpay® is a registered trademark of C2D Payment Solutions Ltd, with company registration number C 91485, which is authorised and regulated by the Malta Financial Services Authority as an Electronic Money Institution under the Financial Institutions Act 1994 (Cap. 376).*

- a) **Google-Analytics:** This website uses Google Analytics, a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, registration number: 368047 (hereinafter referred to as Google). Google Analytics uses various techniques, including so-called 'cookies', which are text files placed on your computer to help the website analyse how users use the site. The information obtained by Google Analytics about your use of the website will be transmitted to and stored by Google on servers which may be operated outside member states of the European Union as well outside states party to the Agreement on the European Economic Area. In case of activation of IP anonymisation within the Google Analytics tracking code for this website, Google will anonymise your IP address before transmission. This website uses a Google Analytics tracking code, to which the operator "gat.\_anonymizeIp();" is added to enable anonymised collection of IP addresses (so-called IP masking). Google will use this information on behalf of the website operator for the purpose of evaluating your use of the website, compiling reports on website activity and for providing other services relating to website activity and internet usage to the website operator. Google Analytics will not associate your IP address with any other data held by Google. You may refuse the use of Google cookies by selecting the appropriate settings on your browser. However, please note that if you do so, you may not be able to use the full functionality of this website. You can prevent Google's collection and use of data relating to your use of the website (incl. your IP address) by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout/>. Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytics/learn/privacy.html>.
- b) **Microsoft Clarity:** We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. You have to consent to the use of these cookies in the cookie-banner. If you refuse the use of these cookies, you may not be able to use the full functionality of this website. For more information about how Microsoft collects and uses your data, visit <https://privacy.microsoft.com/privacystatement>.

## VIII. FURTHER INFORMATION AND CONTACT DETAILS OF OUR DATA PROTECTION OFFICER

For any privacy issues you may have, to exercise any of your rights under the GDPR, or to obtain further information on our data processing activities, please contact our Data Protection Officer at:

**C2D Payment Solutions Ltd**  
6<sup>th</sup> Floor, Portomaso Business Tower  
STJ 4011 St. Julian's, Malta  
Email: [dpo@zastropay.com](mailto:dpo@zastropay.com)

Version 2.1 EN, © C2D Payment Solutions Ltd