

Privacy Policy

Neural ID Pay – <http://www.neuralidpay.com/> (The “Website”) is owned and produced by Neural ID Pay Limited, a limited liability company incorporated under the laws of Ireland, duly registered under the commercial register number 731086 and domiciliated at The Black Church, St Mary’s Place, Dublin 7, Ireland (hereinafter “Neural ID”, “we”, “us”).

For the purposes of data protection law, we are responsible for the collection, processing and use of your personal data in accordance with the laws (“General Data Protection Regulation” or “GDPR”). As the controller of your personal data, we determine the “means” and the “purposes” of any processing activities that are carried out by us.

We would like to inform you below about how we handle your personal data. Please read this Policy carefully and be aware that the following information may be reviewed and amended from time to time.

1. Background

We need to collect and use certain types of information about the physical and legal persons that wish to use our services.

The personal information must be collected and dealt with appropriately in accordance with the company AML Policy and in accordance with this Privacy Policy drawn up in accordance with the GDPR.

In accordance with the provisions of GDPR, any User who provides his information under the present Policy confirms that he understands and accepts the reason for the gathering of information and consents to the processing of information for the purposes of money laundering prevention.

Any User is entitled to know who is responsible for the processing of his or her personal data.

Any data collected during the course of our business whether it is collected on paper, stored in a computer database, or recorded on other material is subject to this policy and is protected under the applicable law and the GDPR provisions regarding data control and processing.

2. What Does This Policy Cover?

This Policy applies only to your use of our Website. The Website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. What is Personal Data?

Personal data is defined by the GDPR as “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Data Do We Collect?

When you visit our Website, our servers temporarily store each access in a log file. Depending upon your use of our Website, the personal information that you provide or that we ask for and collect could include the following:

Identity Data:

- first name,
- last name,
- title,
- date of birth and gender,
- biometric information for facial recognition purposes,
- I.D documents such as national I.D card, passports, driving licences or other forms of I.D documents.

Identity Related Data:

- risk assessment,
- compliance assessment.

Contact Data:

- residence details,
- billing address,
- delivery address,

- email address and telephone numbers,
- proof of address documentation.

Financial Data:

- bank account details,
- payment card details,
- amounts associated with accounts,
- external account details,
- source of funds and related documentation,
- fiscal code.

Transactional Data:

- details about incoming and outgoing payments,
- other details of any transactions you enter into using the services.

Technical Data:

- internet connectivity data,
- IP address,
- operator and carrier data,
- login data,
- browser type and version,
- device type, category and model,
- time zone setting and location data,
- language data,
- browser plug-in types and versions,
- operating system and platform,
- diagnostics data such as crash logs and any other data we collect for the purposes of measuring technical diagnostics, and
- other information stored on or available regarding the devices you allow us access to when you visit the Website, or use the Services or the App.

Profile Data:

- your username and password,
- your identification number as our user,
- requests by you for products or services,
- your interests, preferences and feedback,
- Your profession and industry/sector,
- Purpose of business relationship,

- Expected turnover,
- Annual income,
- Origin of the funds used in business relationship with us,
- other information generated by you when you communicate with our customer support.

Through the usage of Google Authenticator and reCAPTCHA, the following data will be collected:

- The E-mail address you register with and
- The Referrer URL (the previously visited page).

This information may be collected by way of paper documents, scanned or faxed copies, telephone, emails, verbal interviews, face to face interactions, or data received through our Website. This information will include the information collected by us about yourself, and any other individual with whom you deal through us, which include counterparties or senders or beneficiaries of funds or services.

We collect this information through our employees, affiliates, and online resources, government agencies, or business partners, or consumer reporting agencies, or may be provided by yourself upfront when you approach us for applying to our services.

5. How Do We Use Your Personal Data?

Under the Applicable law, we must always have a lawful basis for using personal data. This may be because the data is necessary for our provision of services to you and the performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your access to our Website;
- Supplying our products and services to you;
- Communicating with you;
- Maintaining our own accounts and records;
- Complying with legal and regulatory obligations on our and your behalf; and
- Analyzing your use of our website to enable us to continually improve it and your user experience.

6. Option Out Right

We may use your contact details and information related to your service preferences for marketing and solicitation purposes to send you offers or promotions of us or our

affiliates. You may “opt out” or withdraw consent to disclosure of information for the purposes described in this section at any time by contacting us at dpo@neuralpay.io

7. How Long Will We Keep Your Personal Data?

We will keep your personal data for such a period as is required for us to provide services to you, or such a longer period as we may be required to process the data to ensure our compliance with all relevant laws and regulatory obligations to which we are subject.

8. How and Where Do We Store Your Personal Data?

Personal data is processed both manually and electronically and may be held in a number of different places in line with the operations of a typical business. The locations your personal data could be stored include, but are not limited to:

- Our databases and CRM;
- Emails on computers;
- Mobile phones and tablets;
- Contact address books;
- Business cards;
- Notebooks;
- Electronic documents on our file servers;
- Paper files in our offices;
- Cloud back-up and storage.

The security of your personal data is important to us, and to protect your data we use and maintain appropriate technical and organizational measures to protect your personal data and to prevent the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed. We have a framework of policies, procedures and training to cover information and cyber security, confidentiality and data protection.

9. Sharing and Transfer of Personal Data

We will only disclose personal data to third parties as is necessary to provide our services, to comply with your instructions or if there is a legal obligation to do so. We may share your personal data with our affiliates and subsidiaries.

In addition, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is required by a third-party, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third-party's obligations under the law.

10. Transmission of data abroad

We are entitled to transfer your data to third-party companies located abroad to the extent this is required in connection with the processing described in this Privacy Policy. Any such third-party companies are obliged to respect the privacy of users to the same extent as the provider itself. If the level of data protection in a country does not correspond to the European level, we will ensure, by means of a contract (Standard Contractual Clauses, SCCs), based on a adequacy decision in the meaning of Art. 45 GDPR or upon your explicit consent in the meaning of Art. 49 para. 1 lit. a GDPR, that the protection of your personal data corresponds to that in the EU at all times.

11. Confidentiality

We maintain physical, electronic, and procedural safeguards to protect personal information against loss, theft, and any form of unauthorized access. Only those who are authorized employees, agents, or representatives that require access to your personal information in order to fulfill their job requirements will have access to the information. Our obligations will become effective only when the information is received by us physically or by its internal systems, but not while it is in transmission out of or to our physical possession or internal systems; because data exchange over the internet or the telephone system or physical mail cannot be guaranteed to be perfectly secure, any personal information you submit to us or access electronically or over the telephone is done at your own risk, and we does not guarantee or warrant the security of information so transmitted to us. You should exercise caution to prevent any third parties, or parties fraudulently posing as us, from unlawfully intercepting your transmissions or causing you to disclose personal information.

12. Consent

This Privacy Policy provides our intentions in regard to your personal information collected by us from you. By providing us with personal information, we will assume

your consent to our collection, use and disclosure of such information for the purposes described in this Privacy Policy wherever applicable. Please note that your consent implies the consent to use your email addresses, postal addresses, and other contact resources that you provide to us to communicate with you.

Your consent may be given in various ways, such as: orally, electronically or on a document in any form; or implied by voluntarily choosing to use our services; by not withdrawing consent to use your personal information for any identified purpose; by not using an “opt out” option provided for the specified purposes in this statement, if any. Such consent may be given by you directly or by your legal representative.

Withdrawal of your consent will be entirely at your choice at any time, and will be effective, except in cases where we are subject to legal, contractual, regulatory, governmental, and/ or statutory obligations for record maintenance and disclosure; and except in case of transactions already initiated which need the use of your personal information for fulfillment. Note that in case of such withdrawal of consent we may no longer be able to provide certain of our products or services which require your personal information.

13. Your Rights

Under this Privacy Policy, you have the following rights:

- a) The right to be informed about our collection and use of your personal data.
- b) The right to access the personal data we hold about you – you have the right to obtain confirmation as to whether we process personal data about you and certain information about how and why we process your personal data.
- c) The right to have your personal data amended or rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to erasure (also known as the right to be forgotten), i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- e) The right to restrict the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract or the provision of services, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business.

- h) The right to file a complaint. If you reside in an EEA Member State, you have the right to make a complaint about the way we process your personal data to the supervisory authority in the EEA Member State of your habitual residence, place of work or place of the alleged infringement.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, or in the event that you wish to make a complaint, please contact us at dpo@neuralpay.io

14. Cookies

By accessing the Website, you agree that this section will apply whenever you access the Website on any device.

Any changes to this policy will be posted here. We reserve the right to vary this section from time to time and such changes shall become effective as soon as they are posted. Your continued use of the Website constitutes your agreement to all such changes.

What are cookies and how do we use them?

Cookies are small text files stored on your computer by your browser. They're used for many things, such as remembering whether you've visited the site before, so that you remain logged in – or to help us work out how many new website visitors we get each month. They contain information about the use of your computer but don't include personal information about you (they don't store your name, for instance).

We use cookies to provide the services and features offered on our Website, and to continually enhance the user experience.

We may also use Google Analytics to track and analyze our site traffic in order to improve our Website functionality by collecting data regarding how, when and where people use or access our website. Google Analytics does not collect personally identifiable data.

How can you manage cookies?

- a) **Removing cookies from your device**

You can delete all cookies that are already on your device by clearing the browsing history of your browser. This will remove all cookies from all websites you have visited. Be aware though that you may also lose some saved information (e.g. saved login details, site preferences).

b) Managing site-specific cookies

For more detailed control over site-specific cookies, check the privacy and cookie settings in your preferred browser.

c) Blocking cookies

You can set most modern browsers to prevent any cookies being placed on your device, but you may then have to manually adjust some preferences every time you visit a site/page. And some services and functionalities may not work properly at all (e.g. profile logging-in).

d) Managing our analytics cookies

You can manage your preferences concerning cookies when you enter our Website.

Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be posted on our Website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations.