



# PRIVACY POLICY

*This version of Privacy Policy was updated on 21st of February 2022*

This Privacy Policy lays down how ABS-IMONEY INC. (hereinafter - "ABS") collects Personal Data (as defined below) in compliance with the applicable law and regulations, including Personal Information Protection Act (British Columbia) ('PIPA BC'), Personal Information Protection and Electronic Documents Act ('PIPEDA') and the General Data Protection Regulation ('GDPR') of the European Union as the highest global regulatory standard in the field of personal data protection.

By using the Website and its Services as described in Terms of Service, You agree to be bound by this Privacy Policy. This Privacy Policy is an integral part of the Terms of Service of ABS. For the purposes of this Privacy Policy, ABS defines the term 'Client' or 'You' as a legal entity or individual, either a visitor of the Website and/or a Client of the Services provided by ABS.

The term 'We', 'Us', 'Our' refers to ABS-IMONEY INC. – a legal entity, registered at 1500 West Georgia, Suite 1300 Vancouver, BC, V6G 2Z6, Canada, by Registrar of Companies in Province of British Columbia and holding the Money Service Business license (No.M21433326) for providing services of money transferring, foreign exchange dealing and operating with virtual currencies.

ABS respects Your rights with regard to personal data protection and values its importance, and is wholly committed to keeping Your information safe and secure. This Privacy Policy applies to the Website and all the Services offered by ABS. This Privacy Policy is designed to assist You in understanding how We collect, process and use the information that is necessary to directly or indirectly identify an individual ('Personal Data') using the Website and applying for the Services. Please review this Privacy Policy before You use the Website or any of the Services or features offered on or through the Website. If You do not want Your Personal Data to be used in the ways described in this Privacy Policy, You should not access or use the Website or use any of the Services.

**PLEASE READ THESE TERMS OF SERVICE CAREFULLY AND MAKE SURE YOU UNDERSTOOD. SHOULD YOU FAIL TO UNDERSTOOD ANY OR ALL PROVISIONS DESCRIBED HEREIN, PLEASE CONTACT US.**

**WE MAY UPDATE THESE TERMS OF SERVICE AT ANY TIME WITHOUT NOTICE. YOU SHOULD VISIT THIS PAGE PERIODICALLY TO REVIEW THE CURRENT VERSION. THE VERSION IS INDICATED BELOW.**

## I. INTRODUCTION

ABS provides payment services, including but not limited account opening, transferring and receiving payments in fiat and virtual currencies, enabling internet acquiring, etc.

Any information stored on the Website is treated as confidential. All information is stored securely and is accessed by authorized personnel only. ABS implements and maintains appropriate technical, security and organizational measures to protect Personal Data from unauthorized or unlawful processing and use. ABS does not store Your private keys, pass codes, PINs or other authentication methods and does not have direct or indirect access to Your funds.

We process Your data in an appropriate and lawful manner, in accordance with the Canadian data protection legislation and the General Data Protection Regulation ('GDPR').

This Privacy Policy aims to ensure that You are fully informed on how We will collect and process Your Personal Data.

## II. DEFENITIONS

This Privacy Policy includes the terms and definitions specified in the Terms of Service. If You do not understand any definition listed below, please rely on the definitions designated in the Terms of Service.

### **III. SECURITY OF OUR SERVERS**

Our servers support HTTPS. Please ensure that HTTPS is present in the URL bar when accessing Our Website.

### **IV. WHAT DATA DO WE COLLECT AND FOR WHAT PURPOSES?**

The following division covers the specifics of the data collected through the Website:

#### **Via the Website We may collect data which include:**

- Technical data, such as information about the device You use (mobile or desktop);
- Usage data, which includes information about how You use the Website;
- Data that You provide in the Application: Company name, Country, Name, Email, Phone number.

#### **When You create an Account You will be asked to provide:**

- e-mail address to communicate with You, allowing You to open and operate an Account with ABS;
- phone number to be able to confirm that You are a certain Client and to communicate with You.

#### **We will also ask You to provide some or all of the following documents to verify Your identity, address and jurisdiction, amount and source of funds:**

- Proof of identity (National ID / International ID (double page) / Driver's License) to perform Our contractual obligations towards You, to provide You with Our Services, for KYC and AML purposes;
- Proof of Address (Utility Bill (issued within 3 months) Bank Statement (issued within 3 months) to perform Our contractual obligations towards You, to provide You with Our Services, for KYC and AML purposes.

#### **Depending on the Services You wish to use, We may additionally collect the following types of information:**

- Identity information, such as name, title, place and date of birth, gender, nationality, organization name and position, and information from photographic identity documents such as driver's license or passport information;
- Contact data, such as address and email, personal and business telephone details;
- Financial and/or employment information including business activities and source of funds. If You ask us to provide You with specific legal services, We may also ask You for further information relating to Your employment;
- Details in respect of political exposure or any actual or alleged criminal convictions;
- Information about the origin of Your assets.

Our Website is not intended for storing of 'special categories' of personal data, such as details about Your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information.

### **V. HOW DO WE COLLECT PERSONAL DATA?**

We may collect personal identification information from You automatically:

As You use the Website, We will collect certain technical data including Your information about the device You use to access Our Website and Your usage habits, patterns and preferences.

You can remove cookies from Your computer through the settings on Your browser, but be aware that this may impact Your ability to make use of some features on this and other websites. Management of cookie settings varies from one browser to another. During the process of creating the Account with ABS, Clients provide information such as email address, telephone number (optional), image of the ID document, utility bill and other relevant data.

The Clients data shall be collected and processed by a third party company, who is a trusted partner of ABS for collecting and processing Clients data on behalf of ABS. The Company is an experienced identity verification company that will process Personal Data for the purposes of the necessary KYC/AML procedures. The Company will obtain and process all the above stated Personal Data and run KYC/AML procedures and ensure the compliance with the relevant AML legislation.

For the purposes of the maintaining Clients' Accounts and reviewing Clients for the purposes of KYC/AML compliance, ABS will collect and process the same that The Company will collect in the process of Client verification (KYC) procedure. The Personal Data shall be processed also by ABS.

## **VI. HOW DO WE USE PERSONAL DATA?**

We will only use Your Personal Data when the law allows us to. Most commonly, We will use Your Personal Data in the following circumstances:

1. Where it is necessary for Our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override those interests.
2. It is Our interest to conduct and manage Our business affairs appropriately and responsibly, to protect the reputation of Our business, and to provide You with the best possible Services of the Website.

### **We will use Your technical information to:**

- provide and make improvements to the Website, system maintenance, support, reporting and hosting of data, and troubleshooting;
- ensure that the Website and/or Software are secure;
- analyze how You interact with the Website.

We may also use any or all of the information above to administer and manage Our business in general. If You feel that Your interests and fundamental rights outweigh Our business purposes, and that We should therefore stop processing Your data, please let us know.

### **We use Your personal data in the following purposes:**

- to perform the Agreement. It means processing Your data where it is necessary for the performance of the agreement which You are a party of, or to take steps at Your request before concluding an agreement. This includes Our Terms of Service.
- for marketing purposes. Collecting Personal Data for marketing purposes, We are able to improve Our services and expand the functionality offered. This is how We then decide which of Our Services may be relevant or of interest to You.
- where We need to comply with a legal or regulatory obligation.

In certain circumstances, We may need to retain or use Your data to comply with regulations and/or the law, especially AML laws and regulatory investigations.

We will only retain these data for as long as is necessary to fulfill the purposes for which it was collected or to comply with legal, regulatory or internal policy requirements.

## **VII. TRANSFER AND SHARE INFORMATION**

We sometimes need to share Personal Data We process with third parties. In processing Your transactions, We may share some of Your Personal Data with third party service providers who help with Our business operations. Your information will not be sold, exchanged, or shared with any third parties without Your consent, except to provide ABS Services or as required by law. By using Our Services and accepting Our Terms of Service, You consent to the disclosure of Your Personal Data as described in this Privacy Policy.

We may share information with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of its own legitimate interests in compliance with applicable laws. We will only use and share Your information where it is necessary for us to lawfully carry out Our business activities e.g. with companies to be able to conduct transactions with clients. The legal basis for this data processing is Our legitimate interest and Our legal obligation.

We will reveal Client's Personal Data without their prior permission only when We have reason to believe that the disclosure of this information is required to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to ABS or to others who could be harmed by the Client's activities. We are permitted to disclose Personal Data when We have good reason to believe that this is legally required and when the competent authorities have requested to present them with such Personal Data.

We require all third-party service providers to respect the security of Your Personal Data and to treat it in accordance with the law. We do not allow them to use Your Personal Data for their own purposes and only

permit them to process Your Personal Data for specified purposes and in accordance with Our documented instructions.

### **VIII. DATA PROTECTION LEGISLATION**

The processing of Personal Data is performed in accordance with privacy rights and regulations following the Personal Information Protection Act (British Columbia) ('PIPA BC'), Personal Information Protection and Electronic Documents Act ('PIPEDA') and the General Data Protection Regulation ('GDPR') of the European Union as the highest global regulatory standard in the field of personal data protection.

### **IX. PERSONAL DATA DELETION AND RETENTION**

Personal data that We process for any purpose or purposes shall not be kept for longer than is necessary for those purposes.

#### **We will retain and delete Your Personal Data as follows:**

- Cookies cs\_lng (determination of language), cookie\_policy (Your consent with the Privacy Policy), visited\_buy (notification operating), hide\_buy\_notify (notification operating) will be removed 1 year after Your first visit to the Website.
- Your technical data will be stored in an aggregated, anonymized form without term's limitations.
- Contact data (e-mail address, telephone number) will be removed 1 year after You close the Account.
- Identity information (proof of identity, proof of address) will be removed 1 year after You close the Account and terminate legal relationships with ABS.
- Credit card information (including name, surname, birthdate, address) will be removed 1 year after You close the Account and terminate legal relationships with ABS.

### **X. ELIGIBILITY**

To use the Services, You must be over the age of eighteen (18). ABS does not knowingly collect Personal Information from children under the age of eighteen (18). We do not process any Personal Information of children under this age. We reserve the right to request proof of age at any stage so that We can verify that minors under the age of eighteen (18) are not using the Services. In the event that it comes to Our knowledge that a person under the age of eighteen (18) is using the Services, We will prohibit and block such Client from accessing the Services and will make all efforts to promptly delete or effectively anonymize any Personal Data stored with us with regard to such a Client.

### **XI. PERSONAL DATA SUBJECT RIGHTS**

Your principal rights under data protection legislation are:

#### **Request access to Your Personal Data.**

This enables You to receive a copy of the Personal Data We hold about You and to check that We are lawfully processing it if it is possible to identify the Client.

You may send an email to [support@abs-imoney.co](mailto:support@abs-imoney.co) requesting information as the Personal Data which We process.

#### **Request erasure of Your Personal Data.**

This enables You to ask us to delete or remove Personal Data where:

- There is no reasons for us proceeding to process it;
- You have exercised Your right to object to processing (see below); or
- We are required to erase Your Personal Data to comply with local law.

Note, however, that We may not always be able to comply with Your request of erasure for specific legal reasons which will be notified to You, if applicable, at the time of Your request. These may include instances where the retention of Your Personal Data is necessary to:

- comply with a legal or regulatory obligation to which We are subject; or
- establish, exercise or defend a legal claim.

#### **Request the transfer of Your Personal Data to You or to a third party.**

We will provide to You, or a third party You have chosen, Your Personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which You initially provided consent for us to use or where We used the information to perform a contract with You.

#### **Request correction or rectification of the Personal Data that We hold about You.**

This enables You to have any incomplete or inaccurate data We hold about You corrected and/or updated, though We may need to verify the accuracy of the new data You provide to us. As mentioned, it is in Your interest to keep us informed of any changes or updates to Your Personal data which may occur during the course of Your relationship with us.

**Object to processing of Your Personal data** where We are relying on a legitimate interest (or those of a third party) and there is something about Your particular situation which makes You want to object to processing on this ground as You feel it impacts on Your fundamental rights and freedoms. You also have the right to object where We are processing Your Personal Data for direct marketing purpose. In some cases, We may demonstrate that We have compelling legitimate grounds to process Your personal information that override Your rights and freedoms.

**Request to withdraw Your consent** at any time where We are relying on consent to process Your Personal data (which will generally not be the case). This will not however affect the lawfulness of any processing which We carried out before You withdrew Your consent. Any processing activities that are not based on Your consent will remain unaffected.

## **XII. PRIVACY POLICY UPDATE**

This Privacy Policy may be revised, modified, updated and/or supplemented at any time, without prior notice, at the sole discretion of ABS. We encourage You to check this page with a regular frequency for any changes to stay informed on how We help to protect the Personal Data We collect. Each Client must acknowledge and agree that it is his personal responsibility to review this Privacy Policy periodically and become aware of modifications.

By using Our Website and/or Software, the Client automatically signifies his acceptance of this Privacy Policy. In case the Client continues the use of the Website following the posting of amendments to this Privacy Policy, it will be deemed his acceptance of those amendments.

## **XIII. EXTERNAL LINKS**

Our Website provides links to other third party's websites. These links are provided to You for convenience purposes only and You access them at your own risk.

## **XIV. CONTACT US**

If You have any further questions regarding the data ABS collects, or how We use it, then please feel free to contact us by email at: [support@abs-imoney.co](mailto:support@abs-imoney.co)