



## Privacy Policy

(Effective date: 04.03.2020)

At Privat 3 Money Ltd (P3M), we fully understand how important it is to protect our clients' personal information. This document sets out our Privacy Policy commitment in respect to the information that we hold about our clients and what we do with such information. We recognise that any personal information we collect about our clients will only be used for the purposes we have collected it for, or as allowed under the applicable acts of legislation.

P3M respects the privacy of any user that accesses its website; therefore, we are committed to taking all reasonable steps in order to safeguard information related to any existing or prospective clients, applicants or visitors. Before submitting any personal data, a person should examine the given terms and should only continue by agreeing with the Terms in the given Privacy Policy with principles set for data transfer, storage and processing.

P3M is entitled to unilaterally amend the given principles at any time by notifying the clients no later than 14 days prior to any significant amendments via the P3M website or via email. In issues not regulated by the given Privacy Policy, the parties shall be guided by the General Terms and Conditions of P3M.

### 1. Definitions

**1.1 Client** - means any natural or legal person who has entered into a client relationship with P3M and is actively using, or has used, the services of P3M until the termination of the client relationship. A prospective client is a natural or legal person who intends to use the services of P3M and has made the initial registration for such use of services (without concluding the client relationship).

**1.2 Client Data** - means information that is known to P3M about the client and that is processed by P3M. When this document refers to 'personal information', it means information from which the client's identity is reasonably apparent. The various categories of client data are specified in point 5 of this document.

**1.3 Processing of Client Data** - means any action that is performed with the client data, including gathering, recording, structuring, safe keeping, changing, forwarding, deleting, archiving, etc.

**1.4 Data Processor** - P3M provides payment services and is the data processor of client's personal information in relation to those services.

**1.5 Authorised Processor** - P3M may also use authorised external processors for client data processing, based on concluded service agreements, which are governed by instructions from P3M for the protection of client related data.

### 2. Consent to Process Data

**2.1 Initial registration** - In order to create an account with P3M, a person must make an initial registration via an P3M website's registration form and agree with the terms listed in the given Privacy Policy. The Client confirms acceptance of these terms by ticking the corresponding box on the registration form. If such consent is not given, P3M cannot process a persons' data, nor provide any services to the person in question.

**2.2 Attending courses and participating in campaigns** - The client's data will be processed when registering for the offered webinars or seminars or when landing on any of P3M's campaign pages that require registration – as P3M will need to use a client's personal information to perform its services and comply with its obligations.

**2.3 Cancellation of the initial registration** - When a person cancels the registration process and does not complete it, that person's data will not be retrieved by P3M and will, therefore, not be saved for further processing in the future.

**2.4 Declining the option to be contacted via phone** - A person always has the right to request not to be contacted via telephone by a P3M representative. This request will be saved within P3M's internal systems and acts as a separate restriction which P3M will, of course, respect. The request to not to be contacted via telephone does not affect a client from using P3M's services. Additionally, this does not restrict said person to contact P3M by their own initiative.

### 3. Subscription to Marketing Related Emails

**Privat 3 Money Ltd (P3M)** is registered in England and Wales under Company No **11700691**.

**P3M** is authorised and regulated by the Financial Conduct Authority as an Electronic Money Institution, **FCA registration No: 900989**.

Registered Office: 6, Princes Street, Mayfair London W1B 2LG

3.1 During the initial registration a person has the right to choose whether or not to receive marketing related emails (such as company news, information about campaigns and other similar updates to enhance client knowledge related to the payment industry, etc.) to their submitted email address. It's also possible to unsubscribe from these marketing emails by clicking the link within the emails that have already been received

## 4. The Purposes of the Collection of Client Data

P3M needs to collect various data in order to set a person up as a client, as well as provide various aspects of its services. This data is collected for the below mentioned reasons.

**4.1 Verification of identify.** P3M is obligated to verify a person's identity before entering into a client relationship and creating a payments account for the person. For this, P3M can use third parties which carry out identity checks on its behalf.

**4.2 To form a profile.** In order to comply with legal obligations, P3M creates a profile about the client, once the full application for a payments services account has been reviewed and approved by P3M. P3M needs to apply the principles of KYC (Know-Your-Client) before entering into a client relationship in order to prevent malicious actions, such as money laundering or terrorist financing, and also to perform other duties imposed by law.

**4.3 Internal business purposes and record keeping.** P3M needs to process clients' personal information for internal business and record keeping purposes. Such processing is in P3M's own legitimate interests to comply with its legal obligations. This may include any communications that P3M has with a client in relation to the services it provides. P3M will also keep records that ensure that a client complies with its obligations, defined in the General Terms and Conditions of P3M.

**4.4 Marketing.** P3M may use client data, such as location, transfers and payment history to deliver tailored content, such as news, analysis, research, reports, and campaigns opportunities that may interest the client, to their registered email address. A client always retains the ability to change their preference if they wish or no longer wish to receive such communications.

**4.5 Improvement of P3M products and services.** P3M may, from time to time, use client data to help it analyse and improve its products and services.

**4.6 To investigate or settle enquiries or disputes.** P3M may need to use collected client data in order to comply with applicable laws, court orders, or other judicial process or requirements of any applicable regulatory authorities. Personal data can also be processed to settle disputes with the client.

**4.7 To send client surveys.** P3M may send client surveys as part of its customer feedback process as it is in its legitimate interest to ask for feedback to ensure that it provide the best service to its clients.

**4.9 Website data analysis.** Please find detailed review about website data analysis from P3M Cookies Disclosure.

## 5. Categories of Client Data

Client data may be collected from the client, from the client's use of the services and from external sources, such as public and private registers. P3M has the right and the duty by virtue of its area of activity to check the accuracy of the client data contained in the databases by periodically asking the client to review and/or correct or confirm the accuracy of the client data pertaining to the client. P3M does not collect sensitive information about the client. Client data categories which are primarily collected and processed by P3M consist of the following:

**5.1 Identification data** – such as name, date of birth, personal identification code and data regarding the identification document (such as copy of the passport or ID card).

**5.2 Contact data** – such as physical address, email address, telephone number and language of communication.

**5.3 Family data** – such as information about the client's family, heirs and other related person's (only in cases if a client is related to a politically exposed person or the client has passed away).

**5.4 Professional data** – such as educational and employment details.

**5.5 Financial data** – such as income, assets and liabilities, collected in order to understand the client's resources (for the prevention of any illegal activity).

**5.6 Data about the origin of assets or wealth** – such as data regarding the client's transaction partners and business activities (for the prevention of, for example, money laundering or the financing of terrorism).

**5.7 Data that enables P3M to perform its due diligence measures regarding the prevention of money laundering and terrorist financing** and to ensure compliance with international sanctions, including the purpose of the business relationship, true beneficiaries and whether the client is a politically exposed person.

**5.8 Data about the client's tax residency** – such as country of residence, tax identification number and citizenship.

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5.9 **Communication and activity data** – such as visual and/or audio communication data recordings collected when the client visits the P3M website.

5.10 **Data related to P3M's services** – such as the performance data related to the services of the agreements or the failure thereof, executed transactions, submitted applications, requests, complaints and applied service fees.

5.11 **Data about habits, preferences and satisfaction** – such as data about preferences, satisfaction and activeness of using the services, services used, personal settings, survey responses, etc.

5.12 **Data about client's classification category**- including the client's risk profile.

## 6. Contacting P3M by Email

When you email P3M (via the 'Contact Us' page) a person may be requested to provide some additional personal data, like their name or email address. Such data will be used to respond to their query and verify their identity. Emails are stored on P3M's standard internal contact systems which are secure and cannot be accessed by unauthorised external parties.

## 7. Recipients of Client Data

If necessary, client data is shared with other recipients, such as:

7.1 Authorities, such as law enforcement authorities, bailiffs, notary offices, tax authorities, supervision authorities and financial intelligence units.

7.2 All P3M employees are required to follow data privacy and security policies when handling personal data.

7.3 Institutions providing financial services, for example banks, payment systems, institutions participating in foreign exchange execution, settlement and reporting cycle.

7.4 Auditors, legal and financial consultants, or any other processor authorised by P3M.

7.5 Third parties maintaining registers (such as to credit registers, population registers, commercial registers, securities registers or other registers holding or intermediating client data).

7.6 Debt collectors upon assignment of claims, courts and bankruptcy or insolvency administrators.

7.7 Other persons related to the provision of services of P3M, such as service providers of archiving and postal services.

7.8 P3M may use other external authorised processors for processing client data. In such cases, P3M takes the needed steps to ensure that such data processors process client data under the instructions of P3M with adequate security measures.

7.9 P3M may share client data in the event of a merge, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of P3M's business, assets or stock (including in connection with any bankruptcy or similar proceedings).

## 8. Clients' Rights

P3M respects clients' rights to access and control their personal data. P3M will respond to requests concerning personal data processing and, when applicable, P3M will give access to, correct or delete such personal data.

8.1 **Review of client data processing.** Upon request by the client, P3M shall provide a review of the gathered client data which is available in its client database. Before providing such a review, P3M will ask the individual to prove their identity in order to reduce the risks of identity fraud.

8.2 **Correction of data.** If the personal information P3M holds concerning the client is inaccurate or incomplete, the client is entitled to have it corrected by P3M. P3M may request additional information and documentation required to validate the need for the requested change of data.

8.3 **Restrict processing.** A client may ask P3M to restrict the use of client data for marketing purposes. The client can change its preferences for receiving such notifications via email or telephoning us.

8.4 **Deletion.** A client may ask P3M to delete the personal data that it holds. The request to delete an individual's personal data will result in the closure of their account(s), removal of their data from active processing and a termination of the client relationship. However, P3M is required to maintain the client's personal data to comply with its legal and regulatory requirements, as well as in accordance with internal compliance requirements in relation to the maintenance of records. P3M shall preserve data for at least five years following the termination of the client relationship, unless other terms for the preservation of data or documents are prescribed by law. Unnecessary client data shall be deleted or destroyed.

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## 9. Automated Decision-Making

If P3M has made a decision about a client based solely on an automated process (e.g. through automatic profiling) that affects the client's ability to use the offered services or has another significant effect on the client, the client may ask to not be made subject to such a decision unless P3M can demonstrate to the client that such a decision is necessary for entering into, or the performance of, a contract between itself and the client. Even where a decision is necessary for entering into or performing any obligations arising from the client relationship, the client may contest the decision and request human intervention. Automatic decisions made by the data processing system, without participation of the client, shall be permitted only on the conditions and pursuant to procedures specified by law.

## 10. Organisational, Physical and IT Security Measures

P3M ensures, within the framework of applicable laws, that client data is safeguarded with the appropriate technical and organisational measures to prevent unauthorised access, unlawful processing or disclosure, accidental loss, modification or destruction. P3M shall implement the organisational, physical, IT and other necessary security measures to ensure the protection of Client Data and to monitor the processing of Client Data. Among other things, such security measures shall include the following activities:

10.1 implementation by P3M through its internal rules of the requirements for processing, registering and recording client data as well as procedures for checking the compliance with those requirements.

10.2 authorisation of P3M employees to access only necessary client data in a client database, which is strictly in accordance with the job duties performed.

10.3 imposing an obligation of confidentiality on P3M employees responsible for handling client data.

10.4 unauthorised processing of data (including recording, alteration, deletion, reading, copying, (transmission), unauthorised transportation of records and any other unauthorised use of data (not prescribed by official duties) shall be prohibited.

10.5 Adequate security measures, including encryption of data where necessary, shall be implemented upon transmission of data by means of data communication equipment or in the transport of records.

10.6 Every user of the client database shall be issued a personal means of authentication, enabling them to use the database.

10.7 P3M shall implement adequate and sufficient measures to ensure that every data processing operation leaves a trace, which would afterwards enable identification of the person who performed the operation, the nature and time of the operation and any other relevant facts, including when, by whom and which data were recorded, altered or deleted, or when, by whom and which data in the data processing system were accessed, as well as information on any transmission of data. A possibility for restoring the content of the data before modifications shall be available when any modifications are made to the data or documents.

10.8 The personal information that the client provides in connection with registering itself as a user as registered Information. Registered Information is protected in many ways. It is the clients' responsibility to ensure that the login and password is known only to the client itself.

10.9 Transmission of information via regular email exchange is not always completely secure. P3M however exercises all endeavours to protect clients' personal data, yet it cannot guarantee the security of client data that is transmitted via email; any transmission is at the clients' own risk. Once P3M has received the client information it will use procedures and security features in an attempt to prevent unauthorised access.

## 11. The Geographical Area of Processing

11.1 As a general rule, the client data is processed within the United Kingdom and the European Union/European Economic Area (UK/EU/EEA), but in some cases it is transferred to and processed in countries outside the UK/EU/EEA.

11.2 The transfer and processing of client data outside the UK/EU/EEA can take place provided there are appropriate safeguards in place and the actions are made based on a legal basis only.

11.3 Upon request, the client may receive further details on client data transfers to countries outside the /UKEU/EEA.

## 12. Data Portability

The client has the right to obtain personal information held by P3M, provided that P3M has this in a structured, commonly used and machine-readable format, and to reuse it elsewhere or ask P3M to transfer this to a third party of the client's choice. In case of the forwarding of data to a third party, a clear written consent from the client must be received and verified.

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### 13. Contact Details

13.1 In case of questions about the content of this Privacy Policy, if an individual would like a copy of the data P3M has collected on them, or would like to raise a complaint or other comment with regards to data processing, please contact P3M's appointed Data Protection Officer by post: 6 Princes Street, 4<sup>th</sup> Floor, Mayfair, London W1B 2LG United Kingdom; or email: [compliance@privat3money.com](mailto:compliance@privat3money.com), clearly marking "FAO: Data Protection Officer".

13.2 The general contact details of P3M investment firms are available on P3M website: [www.privat3money.com](http://www.privat3money.com), selecting the 'Contact Us' page.

13.3 The client has the right go to court or to escalate their complaint to the data protection regulator in their jurisdiction for the protection of rights, unless the applicable laws prescribe a different procedure for handling such claims.