

PRIVACY NOTICE

This is the privacy notice of VarsoviaFX Ltd (VFX) and in this document, “we”, “our”, or “us” refer to VFX. For the purposes of data protection legislation, the “Data Controller” is VFX.

We are a company registered in England and Wales under company number 8746313. Our registered office is at Regus, 79 College Road, Harrow HA1 1BD.

Introduction

1. This is a notice to inform you of our policy relating to all the information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
2. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website and users of our money transfer services are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party. We undertake to preserve the confidentiality of all information which you provide to us.
3. This policy complies with the EU Data Protection Directive (95/46/EC), implemented as the General Data Protection Regulation (GDPR), which came into force from May 2018. In the UK, the legal provisions of the GDPR are incorporated in the Data Protection Act 2017, making it applicable after the UK leaves the European Union.
4. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes, then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

When you create an account on our website or otherwise agree to our Terms and Conditions in order to use our money transfer service, a contract is formed between you and us.

In order to carry out our obligations under that contract, we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. verify your identity for security purposes
- 1.2. provide you with our services
- 1.3. provide you with advice about our products, advice on how to use our services and to obtain the most from using our website

We process this information on the basis that there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance in providing our payment services. If we use it for this purpose, you as an individual will not be personally identifiable.

If you continue to use our services once you have agreed our Terms & Conditions, we do not have to seek your consent to use data about you because our contractual relationship is the legal basis for doing so. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

Through certain actions, when there is no contractual relationship between us

(such as when you browse our website or ask us to provide you with more information about our business, including our products and services), you provide your consent to us to process information which may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor performance in providing our services.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at bok@varsoviafx.com. However, if you do so, you may not be able to use our website or our services further.

3. Information we process because we have a legal obligation

As a financial institution we are subject to strict regulations governing the keeping of records, which require us to maintain a record of you and your transactions. We are also subject to the general law, and sometimes we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

4. Information relating to your method of payment

Payment information is never taken by us or transferred to us either through our website or otherwise. At the point of payment, you are transferred from our website to an API of SagePay (or some other reputable payment service provider).

Information about your debit card is stored by SagePay in order to make using our service for future transactions easier. This is done when you first use our service. Complete information about your debit card is not stored on our database.

Only tokens are stored on our secure servers. These are used if you have registered for regular repeat payments, and they store only the last four digits of the debit card.

The reason we do not keep all your payment information is so that we can protect it by:

- 4.1. preventing the possibility of our duplicating a transaction without a new instruction from you;
- 4.2. preventing any other third party from carrying out a transaction without your consent

If we ask you questions about your payment information, we only show the last four digits of the debit card number, so that you can identify the means of payment to which we refer.

5. Your rights under data protection law

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We briefly set out these rights here, but we would ask that you also read the information provided at www.knowyourprivacyrights.org.

You have the right to request the erasure of your personal data unless we have reasonable grounds to refuse the request. You have the right to request the correction of data inaccuracies; to make an access request for the personal information we hold about you; to be provided with a copy of it electronically in a commonly used format; and/or to request its transfer to another data controller.

You have the right to object to how your personal data is used, as described elsewhere in this Notice. You also have the right to restrict the processing of your information, which you may wish to do (instead of your data being erased) if, for example, it is no longer necessary for us to use it, or if you tell us that the data is incorrect. You also have the right to complain to the Information Commissioner's Office (the 'supervisory authority' in the UK for data protection law) about how your personal information is used.

Access to and removal of your own information

6. Access to your personal information

- 6.1. At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.
- 6.2. To obtain a copy of any information that is not provided on our website, you may send us an access request at bok@varsoviafx.com.
- 6.3. After receiving the request, we will tell you when we expect to provide you with the information, which will normally be within one month from your request (or up to two month in the case of a complex request). We will also tell you whether we require any fee for providing it to you.

7. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at bok@varsoviafx.com. This may limit the service we can provide to you. We may refuse such a request if we have reason to believe it conflicts with our obligations under anti-money laundering legislation or is otherwise made to frustrate law enforcement.

8. Verification of your information

When we receive any request to access, edit or delete personal identifiable information, we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

9. Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business.

We do not keep any personally identifiable information associated with your message, such as your name or email address, unless we already have a contractual relationship with you as our customer.

10. Complaints

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Use of information we collect through automated systems when you visit our website

11. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 11.1. to track how you use our website
- 11.2. to record whether you have seen specific messages we display on our website
- 11.3. to keep you signed in our site
- 11.4. to record your answers to surveys and questionnaires on our site while you complete them

We provide more information about the cookies we use in our cookie policy.

12. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address, length of visit and number of pages viewed. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website, how we perform in providing content to you, and to improve our website's usability. We may also use it to detect fraud.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed

in to our website.

13. Disclosure of your information

We will not provide your personal information to any third parties for the purposes of direct marketing without your explicit permission. We may send you by email or text message information which we may think will be of interest to you. We will only do this if you have explicitly consented.

We do not have third party advertisers on our own websites, who use technology that automatically collects data about you when advertisements are displayed (and over which we have no control). Accordingly, this Privacy Notice governs VarsoviaFX Ltd and its website only. We accept no liability for the privacy policy of any other website to which ours may be linked, or the information practices of third parties.

In addition to the disclosure reasonably necessary for the purposes explained in this Notice, we may disclose information about you:

- 13.1. to the extent that we are required to do so by law;
- 13.2. in connection with any current or prospective legal proceedings;
- 13.3. in order to establish, exercise or defend our legal rights or obligations (including the provision of information to assist in the prevention of fraud and money laundering or the reduction of credit risk);
- 13.4. to give effect to, administer or enforce a money transfer requested by you.

14. Credit reference

To assist in combating fraud, we may collect and store information about you from third party sources such as government agencies, credit rating agencies and other providers of public information, in order to verify your identity and the information you supply to us.

15. Data may be processed outside the European Union

Our website is hosted in the United Kingdom.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America. For this reason we ensure that our contracts with data processors include transfer clauses in line with the data protection requirements of the GDPR.

Other matters

16. Use of site by children

We do not provide our services to children, nor do we market to children. You may use our money transfer services only if you are 18 or over.

17. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt all the information which you provide to us.

Whenever information is transferred between us, you can check that it is done using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

We take all reasonable precautions to prevent the misuse, loss, destruction or alteration of your personal information, or the unlawful processing of it. You should ensure that you keep secret the security information which we provide to you, and take all reasonable precautions to prevent its unauthorised or fraudulent use.

18. How you can complain

18.1. If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is bok@varsoviafx.com.

18.2. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

19. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 19.1. to provide you with the services you have requested;
- 19.2. to comply with other law, including the retention period required by the Payment Services Regulations 2017 and by the UK tax authorities;
- 19.3. to support a claim or defence in court.

20. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.