

## Privacy policy

This Privacy Policy (“Policy”) governs processing by **MyNearWallet LLC**, a company registered and operating under the laws of Saint Vincent and the Grenadines under the number 2303 LLC 2022, whose registered address is First Floor, First St Vincent Bank Ltd Building, James Street, Kingstown, St. Vincent and the Grenadines (“Paywithnear”, “we”, “us”) of information, including personal data, relating to the data subjects (“you”, “User”) of the website (“Site”), app (“App”) and other services provided by us (collectively hereinafter “Service”). This Policy applies to the Site, App, all products and Services offered by us.

For the purpose of the relevant data protection regulations, **MyNearWallet LLC** is the data controller regarding your personal data.

### 1. Introduction

**Paywithnear** respects and protects the privacy of our Users (you). Our most important asset is our relationship with you thus we want you to feel comfortable and confident when using our Service.

### 2. Explaining the purpose of data collection and the legal basis we rely on

2.1. We collect personal data for the service provision purposes. **Paywithnear** service provision include: fulfilling contractual obligations, account creation, services of the **Paywithnear** software, processing financial transactions for Users, administering and protecting our business and Site, delivering relevant Site content, determining User preferences, personalizing User experience, meeting a tax requirement and complying with a legal requirement.

2.2. To register an account and use **Paywithnear** services, we process your personal data within the contract we have between you as a User and us as a service provider.

### 3. How do we use your information?

We use your information in the following ways:

- a) to carry out Our obligations relating to your contract with Us and to provide you with the information, products and Services, to notify you about changes to our Services;
- b) to comply with any applicable legal and/or regulatory requirements;
- c) in Our legitimate interests, including as part of Our efforts to keep our Services safe and secure, to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to improve our Services and to ensure that they are presented in the most effective manner, to measure or understand the effectiveness of advertising that We serve and to deliver relevant advertising to you, to allow you to participate in interactive features of Our Services, when you choose to do so, to provide you with information about other similar goods and services we offer.

### 4. When do we collect your personal data?

We collect personal data directly from our Users when they register on our Site or App and use Services. In case **Paywithnear** gets personal data not directly from you, **Paywithnear** will inform you pursuant to the applicable law.

## **5. What categories of personal data do we collect?**

We collect and process the following data:

- First name;
- last name;
- email address;
- phone number;
- wallet number;
- country of living, city of living;
- day of birth;
- A copy of your government-issued ID (passport etc.), proof of residence (e.g. utility bill);
- bank card information (card number, CVC or CVV, card expire date, card holder Name and Surname) amounts sent and received, amounts paid for services;
- the type of virtual financial assets involved, the order volume, price, value;
- virtual currency exchanging records, receiver address, streaming transaction duration;
- transaction history on the Site/App, including withdrawals and virtual and fiat currency exchanging;
- tax ID number;
- information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp;
- a contract with you in the interests of your company or with your company, or your request before entering into a contractual relationship;
- IP address.

## **6. Disclosure of your information**

6.1. We may share your information with selected third parties including:

- a) Our affiliates, business partners, suppliers and sub-contractors for the performance and execution of any contract We enter into with them or you;
- b) advertisers and advertising networks solely to select and serve relevant adverts to you and others; and
- c) analytics and search engine providers that assist Us in the improvement and optimisation of the Site and App.

6.2. We may disclose your personal information to third parties:

- a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Service and other applicable

agreements; or to protect the rights, property, or safety of **Paywithnear**, our Users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;

- c) to assist Us in conducting or co-operating in investigations of fraud or other illegal activity where we believe it is reasonable and appropriate to do so;
- d) to prevent and detect fraud or crime;
- e) in response to a subpoena, warrant, court order, or as otherwise required by law;
- f) to assess financial and insurance risks;
- g) to recover debt or in relation to your insolvency; and
- h) to develop customer relationships, services and systems.

## **7. Your rights**

7.1. You have the right to ask us not to contact you for marketing purposes by contacting us at **help@coinpipe.finance**.

7.2. You have the right to correct any personal information We hold on you that is inaccurate, incorrect, or out of date.

7.3. You have the right to ask us to delete your data when it is no longer necessary, or no longer subject to a legal obligation to which **Paywithnear** is subject to.

7.4. You have the right to transfer your personal data between data controllers, for example, to move your account details from one online platform to another.

7.5. Subject to applicable laws, you may have the right to access information We hold about you. Your right of access can be exercised in accordance with the relevant data protection legislation.

7.6. Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility for them. Please check these policies before you submit any personal data to these websites.

7.7. If you feel that we have not addressed your questions or concerns adequately, you may make a complaint with your local supervisory authority.

7.8. To exercise the rights you may send us the request to the email provided: **help@coinpipe.finance**

## **8. How do we protect your personal data?**

**Paywithnear** has implemented technical and organizational measures grouped in four categories below to protect your personal data:

- a) technical controls: (two-factor authentication, backup, limited access only for those who need it );
- b) procedural controls: (information security policy, acceptable use policy, email policy, data breach policy);
- c) personnel controls: (security awareness training);
- d) physical controls: (smoke detectors and fire alarms).

## **9. How long will we keep your personal data?**

9.1. All personal data collected by **Paywithnear** from you is retained no longer than the period necessary to fulfill the purpose for which personal data was collected (the period).

9.2. When personal data is no longer needed it is deleted. However we may retain your personal data after the period if needed for obligation to comply with applicable law.

## **10. Where your personal data may be processed and transferred?**

Personal data of the European Union citizens is processed by the data processors located within the EU as we use payment processing service providers located there. **Paywithnear** is an international business with operations in countries including the UK, the EU and the US. This means we may transfer to locations outside of your country. When we transfer your personal information outside the EU we rely on adequacy decisions and Standard Contractual Clauses, introduced and/or approved by the European Commission when transferring your data outside the European Economic Area ("EEA") and ensure that any transfer of your personal information is compliant with applicable data protection law.

## **11. Changes to our privacy policy**

Any changes we may make to our privacy policy will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to Our Privacy Policy.

## **12. Contacts**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to **help@coinpipe.finance**

In case of inquiries do not hesitate to contact us on **help@coinpipe.finance**

Mailing address: P.O. Box 1574, Kingstown, VC0 100, St. Vincent and the Grenadines