

Npay Solution Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. This version was last updated on December 21, 2018.



IMPORTANT INFORMATION AND WHO WE ARE

This privacy notice aims to give you information on how Npay Solution Limited collects and processes your personal data. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide.



CONTROLLER

Npay Solution Limited is the controller and responsible for your personal data (collectively referred to as “Npay Ltd”, “we”, “us” or “our” in this privacy notice).

CONTACT DETAILS

- Full name of legal entity: **Npay Solution Limited**
- Name of data privacy manager: **Nikolai Bazhanov**
- Email address: **nb@npaysolutions.com**
- Postal address:

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

THIRD-PARTY LINKS



This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

WHEN AND HOW WE COLLECT DATA

Data we collect



Data you give



- You browse any page of our website
- You use Npay Solution Limited
- You receive emails from us
- You view and sign contracts
- You chat with us for customer support
- You connect integrations
- You opt-in to marketing messages



Your funding of Bitcoin, Ethereum, Ripple, and other Digital Assets, may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data. Because blockchains are decentralized or third-party networks which are not controlled or operated by CreditToken or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

TYPES OF DATA WE COLLECT



Identity Data includes [first name, last name, copy of a passport, your photo, username or similar identifier and password].



Contact Data includes [billing address and email address].



Transaction Data includes [details about payments to and from you and other details of products and services you have purchased from us].



Technical Data includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website].



Usage Data includes [information about how you use our website, and services].



Marketing and Communications Data includes [your preferences in receiving marketing from us and our third parties and your communication preferences and surveys information].

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

- To register you as a new customer
- To notify you about changes to our terms of privacy policy, asking you to leave a review, to keep you informed about our products and services
- To run, administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data (Legitimate Interest; legal obligation)
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences
- Marketing purposes
- Sending you emails and messages about new features, products and services, and content.
- Third party marketing

WHAT EACH OF LEGAL BASES MEAN



Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience.



Performance of Contract means processing your data where it is necessary for the performance of a contract



Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.



Consent

OPTING OUT



You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by [Contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

COOKIES



You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

CHANGE OF PURPOSE



If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Internal Third Parties:
 - Professional advisers acting as processors including lawyers and auditors based in UK who provide banking, legal and accounting services.
- External Third Parties as set out in the [Glossary](#).
 - Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
 - HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes.



INTERNATIONAL TRANSFERS

We share your personal data within the Npay Solution Limited. This will involve transferring your data outside the European Economic Area **(EEA)**.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.



DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.



HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

By law we have to keep basic information about our customers for six years after they cease being customers for legal purposes.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



YOUR LEGAL RIGHTS



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.



Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.



Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.



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



Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data.



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.



Withdraw consent at any time where we are relying on consent to process your personal data. If you wish to exercise any of the rights set out above, please [Contact us](#).