

Heropayments PRIVACY POLICY

This Privacy Policy explains what kind of personal data we use, how exactly we use it, for what reasons do we need your personal data and what rights do you have concerning your personal data.

Personal information is any of your data that can be used to identify you directly or indirectly, or to contact you. Our Privacy Policy covers all personal information that you submit to us or that we obtain from our partners and does not apply to anonymised data, as it cannot be used to identify you.

For the purpose of the relevant data use and protection, we, Heropayments, are the “data controller” of your information. **Heropayments** is a HEROFINTECH Ltd. company, incorporated in HONG KONG (hereinafter “**Heropayments**”, “**We**”).

Heropayments collects any data only on a lawful ground and only data, what is needed to provide our Services to you.

If you have any questions about our Privacy Policy, your personal data, or you would like to exercise any of your data protection rights, please e-mail us at support@heropayments.io.

1. What Information We Collect

The information we collect depends on what Services you use and how you use them.

A. Information You Give Us

- Information that you provide for registering at our Services (like your e-mail) and that you will need to sign up to your account to use our Services;
- Information that is provided to us through your continued use of our Services, such as wallet address to carry the transaction, bank account details, address, phone number, age, etc.;
- Additional information as to comply with our anti-money laundering obligations under applicable law.

The information you give us may include your name, address, e-mail address, account information, payment reason, geographical location, personal description and photograph (for KYC purposes).

During your use of our Services, you can be requested to provide personal data of other individuals. It is fully your responsibility to obtain consent from any individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.

B. Other Information We Collect When You Use Our Services

This type of information we collect when you use our Services, including:

- Details of transactions carried with using our Services, including ID, currency, amount, partner ID, order ID, order description, transaction time;
- Technical details, such as information about your hardware, device manufacturer, unique device identifiers, information about software, the operating system and version running on your system or device, browser and plug-ins, IP address, country, login information;
- Information about your experience while using our Services, such as visited Website pages, any Website you came from to our Website; our Website pages response time, crash reports and errors, length of visit, page interaction information, information provided to our support team. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

We also receive this information when you view our Website, which we refer to as *Log Data*, even if you have not signed up. This Log Data includes your IP address, operating system, visited pages, location, hardware or device information, and cookie information. We use Log Data to operate our services and to ensure their secure performance.

C. Information Provided to Us by Third Parties

By signing up to use our Services you agree that we may obtain information about you from third party sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, business partners. We obtain such information to comply with our legal obligations, such as anti-money laundering laws, which is our lawful basis for processing, and to provide you with our Services. In some cases, we may process additional data about you to ensure our Services are not used fraudulently or for other illicit activities.

We do not receive your credit card number or other financial information or any sensitive information.

Other Third Parties

We may receive pseudonymised information from third parties like advertising networks or analytics providers.

We may also receive information about you if you use any other of our Services.

2. Cookies

Our Services use cookies to distinguish you from other users. This helps us to provide you with a good experience and allows us to improve our Services.

3. How We May Use Information

We are not entitled to process your personal Information without sufficient legal grounds. Therefore, we use your personal information in the following ways and if processing is necessary:

- To fulfill our contractual obligations, including providing you with information and Services (e.g. Terms of Service);
- To keep your account secure;
- To comply with our legal obligations, such as, for example, anti-money laundering obligations;
- To notify you about changes to our Services and provide with other essential information;
- For our legitimate interests.

4. How We May Share Information

Sometimes we may need to share your data with a third party. We may share your data with our contractors provided these third parties assume confidentiality obligations regarding your personal data.

Please, be informed that we may disclose your personal data to the following third parties:

- Other companies and organisations including our group entities or subsidiaries;
- Government or law enforcement officials, enforcement, exchange body, central or local government department and other statutory or public bodies or court;
- Business partners, suppliers, contractors, sponsors, analytics, search engine providers.

We may share your personal information:

- In order to provide our Services to you or to administer them;
- In order to comply with any applicable laws or regulations. This includes exchanging information for the purposes of detecting and investigating fraudulent or unlawful activity and respond to claims and legal process;
- To prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable or that poses a threat to the safety of you, another person or the public generally;
- In case of merger, acquisition or any other reorganizations of our company, transfer of control with transfer of all information to the relevant third party with your consent to do so if required by law.
- Anonymous or aggregated information or other data that does not directly identify you is shared for the analysis.

If you would like to get a full list of all third parties with whom we share your data, please, e-mail support@heropayments.io, as the list may vary depending on your specific use of our Services.

5. Where We Store Information

Generally, we store your personal information in the European Economic Area (EEA). In case you are from a jurisdiction where transfer of your personal data to another jurisdiction requires your consent, then by submitting your personal information you provide us with your express and unambiguous consent to such transfer, storage, and/or processing of the information in other jurisdictions.

The data that we collect from you may be transferred to, and stored outside your jurisdiction; for example, our employee or one of our partners in another jurisdiction may need to process your data to fulfill your order, transaction or to provide you with our support.

We only transfer your information if we have taken all steps reasonably necessary to ensure that your data is treated securely and in accordance with our Privacy Policy.

6. Transferring Outside of the European Economic Area (EEA)

Our Services may require transferring your personal information outside of the EEA. We only transfer your personal information to third parties in cases when we ensure that both our partners and we ourselves take adequate and appropriate technical, physical and organisational security measures to protect your privacy and your rights.

7. How We Protect Your Information

We take appropriate technical, procedural and physical security measures to comply with the relevant laws and regulations and to prevent unauthorized access, use or disclosure of your personal data. We regularly monitor our systems for possible vulnerabilities and attacks. Your information is stored on secure servers.

We restrict access of your personal information to those employees by those who have a business reason to access and professional skills allowing them to work with your personal information.

Although we will do our best to protect your personal data, you should understand, it is not possible to guarantee the complete security of transfer via the Internet, and any transmission using the Internet connections is at your own risk. Once we have received your information, we will try to prevent unauthorised access, use or disclosure of your personal data.

8. Your Choices About Collection and Use of Your Information

We would like you to know, that among other, you have the following rights in relation to your personal information:

- to access: at any time, you can ask us about what personal data of yours we have, how we use it, why we process it, who we have told about you, etc. You also can ask us to give you a copy of your personal data we are processing;
- to correct: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or there is no need to proceed it anymore;
- to delete: you can ask us to delete all the personal data that we have about you. We will also deactivate your account. Please, note, that we cannot restore permanently deleted accounts; to object the processing: we will no longer process your personal data, but we can still keep them;
- to transfer (in certain specific circumstances): if you wish, you can ask us to download (export) all personal data that we have in the format acceptable to give it to someone else or ask us to give them your data directly.

9. Automated Decision Making

Automated decision making process (ADM) may be used as part of our Services in order to fasten the process. For example, ADM may check the accuracy of provided information. Please, note that ADM does not affect you in a legal sense.

If the fact that we process your personal data automatically and we take some decisions according to it, affects you in any serious way, you can always contest any decision that is based on ADM results.

10. Data Retention Periods

We may keep information that we may need to resolve any disputes, enforce our agreements with you and provide you with the possibility to use our Services, protect legal rights, and comply with technical and legal requirements and constraints related to the security and operation of our Services for as long as it is reasonably necessary or required. For example, we should keep some of your personal and transactional data for 1 (one) year minimum after termination of the business relations between you and us for KYC purposes. In such cases, we keep and access your data only internally and on a need to know basis.

Otherwise, we will delete information when it is not anymore reasonably necessary to keep it to provide you Services, to comply with applicable laws and regulations, and to run our business.

11. Children

We kindly remind you that our Services are not intended for use by children under 18 years of age (see User agreement). We do not knowingly collect or process any personal information from or with respect to children. If we become aware that we have collected personal data on behalf of a person under the age of 18, we will delete this information when we become aware of it. By our side, we will block or restrict the child from accessing our Services, and/or obtain consent from parents for the collection, use, and sharing of their children's personal information, if we will need this information.

If you have any reason to believe that we have collected such personal data, please, inform us immediately.

12. Third Party Services

Our Services may contain links to third party services. If you click on those links, you will leave our Service. As we do not operate those sites, applications and services, we cannot take responsibility for the privacy practices of the entities that operate them. We

recommend that you consistently check privacy policies of every site. As a kind reminder, Our Privacy policy concerns only our products.

13. Changes to Our Privacy Policy

We may update this Privacy Policy from time to time, please review it frequently. We will notify you on changes by a notice on our home page or, where appropriate, by e-mail.

Your continued use of our Services means you accept the changes. If you are asked to accept affirmatively material changes to Our Privacy Policy and you decline to do so, you may not be able to continue to use the Services.