

Privacy Notice

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**CUSTOMER PRIVACY NOTICE
PURE OPERATOR**

Effective: November 1, 2024

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The basics

We are committed to protecting and respecting your privacy. We will always keep your personal data safe and private; never sell your personal data; and allow you to manage and review your marketing choices at any time.

Introduction

This Customer Privacy Notice describes the principles on how Pure Operator processes your personal data and is applicable to any person who uses has used or has expressed their intent to use the services of Pure Operator. All the definitions used in, and all circumstances not covered by this Customer Privacy Notice shall be regulated by the terms and conditions of Pure Operator.

The notice concerning the processing of cookies is described in [Cookie Policy](#) and is accessible on the [Website](#).

In the context of this Customer Privacy Notice references to we, us, our mean Pure Operator including all its affiliates.

Why Do I need to read this Notice?

We will collect your personal data when you use our mobile application.

When we say, "personal data", we mean information which can be used to personally identify you (for example, a combination of your name and postal address).

This Customer Privacy Notice explains what information we collect, how we use it, and your rights if you want to change how we use your personal data.

Pure Operator has appointed a data protection officer who can be reached via support@purewallet.app. All the inquiries and complaints concerning the processing of personal data should be addressed to said email address.

What personal data do you collect about me?

Data you give to us

- Identification data, e.g. your photo, name, date, and place of birth address
- Identity document data, e.g. photo of the document, number, and validity
- Contact data, e.g. phone number, email address, your residential address
- Information you provided to us in any form filled out previously
- Financial data, e.g. ownership and source of funds and or wealth
- Correspondence between you and us
- Marketing and communication data e.g. data used to understand, reach, and engage target audiences in the context of marketing and communication strategies.

Data about you from third parties we work with

- Information from publicly available sources e.g. such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches, and KYC purposes.

Technical Data we collect for use for our services

- Usage data, e.g., information what actions you performed in the App
- Information from your device, e.g. such as IP address, your mobile operating system and other technical information.

Profile Data we collect about you

- Transaction data and the nature of using the service e.g. transaction sums counterparties bank account and card numbers and account holders
- Product Preferences, for example, data on the financial products or services that you frequently use or express interest in
- Employment Information, for example, job title, employer, and income level, which may be used for risk assessment or product recommendations.

How do we use your personal data?

- In general, we are processing your personal data for the performance of or entering a contract with you, i.e. personal data is processed for the purposes of providing the services Without processing personal data we would be unable to provide services to you including due to regulatory restrictions.
- The purposes for which we are processing personal data are the following:
 - Fulfilling a contractual obligation, e.g. executing your transaction orders and ensuring the safety of your assets,
 - Fulfilling a legal obligation e.g. ensuring the security of accessing the Account and the transactions and using the data for accounting and reporting purposes,
 - Public interest e.g. by performing necessary acts to prevent money laundering and the financing of terrorism and thus to ensure the proper identity verification,
 - Sending informative and promotional notifications or collecting processing storing and disclosing personal information e.g. name and contact information with our partners to conduct campaigns and ship the rewards under a revocable consent received from you and
 - Our legitimate interest to prevent fraud and to improve our products and services as well as to promote the launch and usage of new functionalities and features and to illustrate the benefits and possibilities of cryptocurrencies and investing e.g. by identifying concurrently used app versions and by sending promotional content regarding new features and products and to conduct campaigns including in cooperation with third parties and ship the rewards
- For entering into and for the performance of the contractual agreement between you and us and for public interests Pure Operator is applying certain automated decision making methods to assess your capability suitability behaviour and reputation whether to enter into or to continue a contractual relationship The aforesaid assessment is accompanied by human intervention by an employee of Pure Operator who will perform the final assessment
- For entering and for the performance of a legal obligation Pure Pay is obliged to assess your capability, suitability, reputation, and financial situation whether to enter or to continue a contractual relationship with you in which case the personal data is processed by Pure Operator as a data processor.

How do we share your personal data?

Who?	Why?
<p>Pure Group of Companies: Pure Pay GmbH, Pure Wallet UAB, Pure Wallet SRL, DonauCapital Pure Investment GmbH (each Pure Operator) and FXNET Ltd.</p>	<ul style="list-style-type: none"> • To provide you with the best service • improve existing, or develop new, products or services - send you information about Pure products and services we think you will be interested in hearing about
<p>Identity verification, KYC service provider and fraud prevention company, SUMSUB TECH LTD incorporated and registered in Cyprus.</p>	<ul style="list-style-type: none"> • To help us verify your identity so we can provide our services to you. Sum & Sub company
<p>Our banking and financial services partner, Electronic Money Institution, Unlimit EU Ltd is regulated by the Central Bank of Cyprus.</p> <p>Our VISA card partner – Wallester AS, incorporated and registered in Estonia.</p>	<ul style="list-style-type: none"> • To help us provide our services to you. This includes banking and lending partners, banking intermediaries and international payment service providers as well as VISA car provider.
<p>Analytics providers and search information providers</p> <p>Google Analytics</p>	<ul style="list-style-type: none"> • To help us improve our website or app
<p>Communications service providers, companies that support our IT infrastructure</p> <p>Obermind Ltd registered in the UK – our APP developer</p> <p>V.D. ComputerLand Centre Ltd registered in Cyprus – our IT provider</p>	<ul style="list-style-type: none"> • To help us send you emails, push notifications and text messages
<p>Government bodies</p>	<ul style="list-style-type: none"> • To meet our legal obligations

Why do we process your data?

We must have a legal basis (a valid legal reason) for using your personal data. Our legal basis will be one of the following:

- Keeping to our contracts and agreements with you

We need certain personal data to provide our services and cannot provide them without this personal data.

- Legal obligations

In some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

- Legitimate interests

We sometimes collect and use your personal data because we have a legitimate reason to use it, and this is reasonable when balanced against your human rights and freedoms.

- Substantial public interest

Where we process your personal data, or your sensitive personal data (sometimes known as special category personal data), to adhere to government regulations or guidance, such as our obligation to prevent fraud or support you if you are or become a vulnerable customer.

- Consent

Where you have agreed to us collecting your personal data, or sensitive personal data, for example when you tick a box to indicate you are happy for us to use your personal data in a certain way.

When do we collect your personal information?

We may collect your personal information about you when:

- When you talk to us on the phone
- When you use our website or app
- When you enter a competition or promotion sponsored by us or third parties
- When you report any problem with our website
- In emails and letters
- In customer surveys

International transfers

The data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data,

you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Customer Privacy Notice.

Direct Marketing: Email, SMS and Push Notification

When you sign up for your account we will ask if you would like to be contacted about new features, offers and tips about your money. If you tell us, you are happy to be contacted, we will send you information about things you might be interested in via email, SMS or push notifications.

You will only get push notifications if you have the Pure App and have enabled notifications in your phone settings. If you wish to stop receiving push notifications just turn this off in your phone settings.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including:

- The right to receive a copy of the personal data we hold about you.
- The right to rectification if we hold incorrect data about you.
- The right to make a complaint at any time to the appropriate supervisory authority.

You can escalate your concerns to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues:

Website: www.ico.org.uk

Email: casework@ico.org.uk

Telephone: 0303 123 1113

Also, you may escalate your concerns to one of the following relevant authorities:

In Germany:

Federal Commissioner for Data Protection and Freedom of Information (BfDI)

- Website: www.bfdi.bund.de
- Email: poststelle@bfdi.bund.de
- Telephone: +49 (0)228 997799-0

In Lithuania:

State Data Protection Inspectorate

- Website: www.vdai.lrv.lt
- Email: ada@ada.lt
- Telephone: +370 5 271 2804

Your rights to object to restrict our use of your personal data

You have the right to ask for your personal data to be restricted if you think:

- It is not correct;
- If you think it has been used unlawfully, but you do not want it deleted;
- If it is no longer relevant, but you want us to keep it for a legal claim; and
- You are waiting for us to confirm if we are allowed to keep on using it, but you have already asked us to stop using your data.

Your rights to object to use processing your personal data

Data collection is optional, however, if you decide not to share required personal data with us, it may delay or stop us from meeting our obligations. This can also mean that we cannot perform services needed to run your accounts. We are required to collect certain personal information by law, and/or under the terms of a contract we have with you. By not sharing the required data with us may mean that we may cancel a product or service you have with Us.

If you want us to stop using your personal data for any of the above cases, please contact us at support@purewallet.app.

Your rights to obtain a copy of your personal data

You can access the personal information we hold by emailing us at support@purewallet.app.