

Privacy Policy

Introduction

MONEYTRANS is the trading name of MONEYTRANS PAYMENT SERVICES S.A., a financial corporation incorporated in Belgium under company number BE.0449.356.557, with its head office located at Waterloolaan 77/01, 1000 Brussels (Belgium). MONEYTRANS PAYMENT SERVICES S.A. is a Payment Institution duly authorised by the National Bank of Belgium (www.nbb.be) to provide payment services and benefits as such from the right to provide its licensed services in Belgium and across the EU via affiliated companies and duly authorised agents.

This Privacy Policy sets out the way MONEYTRANS PAYMENT SERVICES S.A., its affiliated companies and authorised agents (hereinafter individually or collectively referred to as "Moneytrans") collect and process personal data about the customers of the payment services provided at authorised Moneytrans retail locations, via the transactional website hosted at the address https://www.moneytrans.eu (the "Moneytrans website" or "website") and/or via the Moneytrans mobile application ("the mobile application", hereinafter also referred to, jointly with the website, as "digital platforms").

MONEYTRANS is the data controller responsible for processing the personal data collected about its customers and commits to performing such processing in accordance with the applicable laws and regulations, and in particular with the terms of the EU General Data Protection Regulation n°2016/679 from 27 April 2016, as well as with the terms of the national laws transposing the EU Directive n°2018/843 from 30 May 2018 on the prevention of the use of the financial system for money laundering or terrorist financing purposes.

MONEYTRANS reserves the right to modify this Privacy Policy at any time and shall inform its customers of future amendments by e-mail, phone messaging (SMS) or by posting a clear notice on its website. The customers may object to any changes made in the use of their personal data by writing to MONEYTRANS, using the contact details disclosed in the section 9 below.

1. Personal data collected about the Customers

MONEYTRANS collects data of a private nature about its customers when executing financial transactions directly instructed by them. When a customer registers with the Moneytrans website and/or the mobile application, submit data via an online form, takes part in a survey or communicates with MONEYTRANS employees or authorised agents, they may also transmit any or all of the following personal information about them:

- Full name, address of residence, date and place of birth, citizenship number and details relating to their valid identity document,
- Contact information (email address and/or phone number),
- The copy of their valid identity document and, where applicable, of a formal proof of address,

- Where required, information or documents disclosing the purpose of their transactions and/or the origin of the funds used in connection with operations executed via MONEYTRANS,
- The identification data of the counterparties of the financial transactions executed via MONEYTRANS,
- Their bank account details, or the details of the payment card(s) used to settle new payment orders initiated via the website and/or the mobile application of MONEYTRANS.

In addition to the aforementioned set of personal data directly collected from the customers, MONEYTRANS may also collect the following additional information about the users of its digital platforms (the transactional website and the mobile application), via "cookies" or similar technologies downloaded from its servers:

- The IP address of the online user,
- The type of operating system and of Internet browser software installed on the device used to access the MONEYTRANS website or mobile application,
- The detail about the visits on the website and/or mobile application and, where applicable, on the websites
 or mobile applications of third parties accessed via links embedded on the MONEYTRANS website or mobile
 application.

The cookies or similar technologies generated by the Moneytrans website and/or the mobile application are stored on the device of the customers for a limited period. Data retrieved via such technologies is essential to ensure the proper functioning of the digital platforms of Moneytrans and the online financial services provided therein, by allowing the webpages and/or the mobile application to display correctly on the users' devices. Cookies also help to authenticate registered users and to customize user sessions, but they do not allow to collect any personal data about the users or to identify them as a person. For more information about the use of cookies by MONEYTRANS, please refer to our <u>Policy on Cookie Use</u>.

2. Use of the Personal Data

Personal data collected about Moneytrans customers is solely used for the following purposes:

- To provide the financial services ordered by the customers and execute the payment transactions according to their instructions,
- To receive online payments from the customers using the website or the mobile application;
- To comply with the legal obligations applicable to financial institutions regarding the identification of
 customers and of the characteristics of their transactions and the ongoing surveillance of business
 relationships and occasional transactions,
- To provide customer support services in case of problems, questions or complaints relating to the services provided or to pending individual payment transactions,
- To inform the customers about changes in the services provided by MONEYTRANS,
- To administer the client accounts and to perform overall customer management,
- To carry out direct marketing actions, including by sending notifications by e-mail or by SMS about other services provided by MONEYTRANS, which may be of interest to registered customers. The customers may however withdraw their consent to receive such notifications at any time in accordance with the procedures set out below,
- To carry out anonymised research and statistics about the use of the financial services and/or of the digital platforms.

How to unsubscribe from direct marketing mailing lists?

Even when a customer has given their initial consent to receive marketing information from MONEYTRANS, they may withdraw this consent at any time.

The procedure for unsubscribing from the commercial mailing lists is included in each e-mail sent out by MONEYTRANS. Alternatively, the customer can also send an e-mail to onlinesupport@moneytrans.eu with the subject "UNSUBSCRIBE REQUEST" and indicate in the body of their message the e-mail address or phone number they wish to have deleted from MONEYTRANS' mailing list. We will then comply with the unsubscribe request within 7 working days.

3. Transmission of Personal Data to third parties

In principle, personal data collected about the customers is only shared with the following parties:

- MONEYTRANS employees who are in charge of executing the payment orders instructed by the customers and of providing overall customer support,
- The counterparties of the operations as identified by the clients themselves,
- Where applicable, other affiliated companies and/or third-party companies whose intervention is necessary or useful for the execution of the operations initiated by the customers or the completion of the other data processing purposes listed in the section 2.

When personal data is transferred to companies or correspondents based outside of the European Economic Area, MONEYTRANS ensures that such counterparties provide an adequate level of protection to the data transferred, through specific contractual clauses, binding corporate rules or self-certification mechanisms recognised by the European Union as providing a level of data protection equivalent to the one provided under the General Data Protection Regulation n°EU/2016/679.

However, MONEYTRANS reserves the right to also transfer the personal data of its customers to other third parties, in the cases listed below and in accordance with the regulations in force:

- In the event that MONEYTRANS or the majority of its assets are acquired by a third party,
- When MONEYTRANS or a third-party company to which personal data has been legally transmitted is required to communicate such data to a judicial or supervisory authority, in order to comply with their legal obligations related to the fight against money laundering and the financing of terrorism,
- In order to enable MONEYTRANS to enforce its intellectual property rights, its general terms of use or any other clause governing its contractual relationship with its customers,
- In cases where a website user has been directed to the MONEYTRANS website via third parties to whom MONEYTRANS is liable to pay commission charges, and/or,
- When MONEYTRANS relies on third parties to operate its services provided via its website or mobile application (e.g. via a third-party acquirer in charge of processing online payments or identifying the client).

4. Right to Access and to Amend Personal Data

MONEYTRANS customers may at any time access the personal data held about them and request, as the case may be, to update their personal information, to rectify incorrect information or to request the deletion of their account registered with MONEYTRANS.

Registered users of the website or of the mobile Application of MONEYTRANS may exercise such rights directly, by accessing their personal data in the section "My Account" section and by making the appropriate changes or requesting them online. The customers may alternatively request the relevant changes from the customer service of Moneytrans, buy using the contact details disclosed in the section 9 below. MONEYTRANS will ensure to process any such request received from the customers within 7 working days.

The customers however acknowledge that, in the event that they refuse to communicate their personal data necessary for the processing of their transactions instructed to MONEYTRANS, or that they wish to obtain the deletion of their customer account registered with MONEYTRANS, such requests shall result in MONEYTRANS being unable to enter into a contractual relationship, to continue such a relationship or to execute financial transactions instructed by the customers, as the case may be.

5. Communication with the Clients

Registered customers are likely to receive transactional e-mails or SMS messages generated by MONEYTRANS, which are necessary to administer the customers' accounts and execute their financial transactions. Such notifications aim, for instance, to:

- Confirm the validation or the execution of a payment order initiated by the customer,
- Notify the receipt or the failure of a payment made by the client to settle a transaction,
- Send a one-time authentication code that the customer must use to confirm a new payment order, following the "two-factor identification" method,
- Confirm the modification of a password, of personal data or of other means of access (such as a PIN for a card),
- Confirm any other transaction carried out online or at an authorised MONEYTRANS location.

The customers may also receive notifications by e-mail or SMS, informing them of promotions, special offers or new products proposed by MONEYTRANS. In line with the terms set out in the section 2 above, the customers may choose at any time to opt out from receiving such communications sent for direct marketing purposes.

6. Security of Personal Data

In order to protect the security and the integrity of the personal data of its customers attended at authorised retail offices, MONEYTRANS implements a number of measures, which include:

- identifying and verifying the identity of the customers on the occasion of each of their new transaction, as a means of preventing identity theft,
- using two-factor identification methods to authenticate the employees in charge of processing financial transactions for the customers,
- installing digital certificates on the computers used at retail offices to connect to the MONEYTRANS software and keeping the client database stored on highly secured servers protected against data loss or theft.

The security and integrity of the personal data of the users of the MONEYTRANS website is respectively ensured through the use of the « Secure Socket Layer" (SSL) technology. This technology guarantees that all communication taking place between the Moneytrans website and the computer of the users is encrypted and hence protected against external attempts to steal personal data.

The identity of the Moneytrans website is moreover certified by an external Authority, which guarantees its security via the label «HTPPS» disclosed in the website address (URL).

Such security measures can however only be effective if the website users themselves follow certain precautionary measures aimed at protecting their personal data on the Internet, such as those listed hereafter.

7. Measures to Keep Personal Data Safe on the Internet

It is the responsibility of the customers using the services provided through digital platforms to respect at all times the following instructions to protect their personal data exchanged with MONEYTRANS:

- 7.1. Never share your personal login details to the MONEYTRANS website and/or mobile application with third parties,
- 7.2. Choose a strong password that cannot be easily guessed and includes a combination of letters, numbers, and symbols,
- 7.3. Avoid using the same password across different websites and/or mobile applications you registered with,
- 7.4. Reset your password regularly (for instance: every 3 months),
- 7.5. Never write down your password on a medium that is easily accessible to third parties,
- 7.6. Do not connect to the MONEYTRANS website and/or mobile application via an unsecured WIFI connection,
- 7.7. Sign out from your account when you leave the website and/or mobile application,
- 7.8. Install an antivirus software on your computer and keep its version up to date,
- 7.9. Never enter personal information on a website whose connection is not secure (a connection can be deemed secure if the URL address of the website shows the label "HTTPS"),
- 7.10. Never answer to an e-mail asking for your personal information relating to your username, password, bank account or payment card details used on the MONEYTRANS website and/or mobile application. Such fraudulent e-mails, also called "phishing e-mails" aim at stealing your personal login information and financial data, possibly by directing you to a counterfeited website. MONEYTRANS will never send to its registered online users such e-mails. Similarly, our Customer Service will never contact you by telephone to ask you to provide such sensitive information orally.
- 7.11. E-mail generated by the website and/or mobile application or sent by our Customer Service always use the extension @moneytrans.eu. Immediately delete from your mailbox and do not open any attachment included in an e-mail claimed to be sent out by MONEYTRANS, and which does not have that extension. Registered users of the MONEYTRANS website and/or mobile app must additionally follow the security measures set out in the General Terms of Use of the MONEYTRANS website, which set out more in detail their obligations to prevent the unauthorised use of their personal access codes to the Moneytrans website.

8 Retention of Personal Data

In line with the applicable laws pertaining to the prevention of money laundering and terrorist financing, MONEYTRANS is required to keep the information and the documents collected from the customers of its financial services as well as their full transaction history for up to ten years following their last operation date. MONEYTRANS cannot therefore comply with requests related to the deletion of its customers' data before the expiry of the legal data retention periods set out for the customers of financial institutions.

9 MONEYTRANS Contact Details

Any question or request about this Privacy Policy should be communicated to the Customer Support Service of MONEYTRANS through one of the following means:

- By letter sent to: MONEYTRANS PAYMENT SERVICES S.A., 77/box 01 Waterloolaan, 1000 Brussels, Belgium
- By e-mail sent to: onlinesupport@moneytrans.eu
- By calling one of the following numbers, depending on your country of residence:

Belgique: +32 2 227 18 20 Pays-Bas: +31 10 205 24 53 France: +33 0809 54 97 88

This Privacy Policy has been published on the Moneytrans website and entered in force on 7 April 2021.