

PRIVACY POLICY

Version 1.0

Last Updated: 03.10.2024

GENERAL INFORMATION

Welcome to <https://payments-lab.com/> (hereinafter referred to as the "Website"). By accessing and using the Website on any electronic device, you acknowledge that you have read, understood, and agree to comply with these Terms of Use (the "Terms") as well as all applicable laws and regulations. The Website is owned and operated by PAYMENTS LAB Ltd, incorporated in Malta with company number C106647, whose registered office is at 152, No 9, Naxxar Road, SAN GWANN SGN9030, MALTA (referred to as the "Company", "We", "Us", or "Our"). Should you have any questions or wish to make a complaint, please contact us at info@payments-lab.com.

At PAYMENTS LAB, safeguarding your personal data is our paramount concern. We fully recognise the significance of privacy and confidentiality regarding the information you entrust to us. This Privacy Policy details the procedures governing the collection, use, and management of your personal data when accessing our services. Our data practices align strictly with the legal framework in Malta, ensuring full compliance with applicable data protection laws, including the GDPR.

By utilising PAYMENTS LAB's services, you are entrusting your data to a service provider committed to the highest standards of privacy protection. This Privacy Policy serves as our assurance that your data will be handled with transparency and care throughout your engagement with our services.

Data Controller: PAYMENTS LAB Ltd

Contact Information: incorporated in Malta with company number C106647, whose registered office is at 152, No 9, Naxxar Road, SAN GWANN SGN9030, MALTA

Data Protection Officer (if applicable): dpa@payments-lab.com

hereinafter referred to as "**PAYMENTS LAB**".

INFORMATION WE COLLECT

When you interact with our website and initiate a business relationship with us, we may request the following personal information:

- **Name:** we collect your name to provide a personalised experience when using our services. This allows us to address you appropriately and tailor our communications to suit your preferences.
- **Email address:** we collect your email address for essential communication purposes. This includes sending you service updates, notifications about changes, and relevant information to ensure you remain informed and can utilise our services effectively.
- **Phone number:** your phone number is collected to enable prompt communication for service-related purposes and customer support. This ensures timely assistance if there are any urgent matters or inquiries regarding our services.
- **Place of work:** this information is collected to help us better understand your professional background, enabling us to tailor our services to meet the needs of our business clients.
- **Technical Information:** for example, information about your device (e.g., IP address, browser type), information related to interactions with our website, other usage data, cookies and similar information.

In certain situations, we may request additional information to comply with legal or business requirements. Any further data we collect will be in accordance with our internal processes and in full compliance with applicable legislation.

We may also obtain relevant data from third-party service providers, publicly available sources, employee referrals, or trusted business partners. While we do not actively notify clients of such data collection, we remain committed to transparency and will disclose this information upon request, provided it does not contravene any legal obligations.

LEGAL BASIS FOR PROCESSING YOUR DATA

We process your personal data based on the following legal grounds:

- **Provision of Services:** we collect and process your data because it is necessary for the performance of a contract (Article 6(1)(b) GDPR).
- **Service Updates and Support:** we rely on your consent or legitimate interests (Article 6(1)(a) and Article 6(1)(f) GDPR) for updates and communication.
- **Compliance with Legal Obligations:** we process your data to comply with legal obligations (Article 6(1)(c) GDPR), including fraud prevention and ensuring the security of our services.

HOW WE USE YOUR INFORMATION

The data we collect is utilised for the following purposes to ensure the smooth operation of our services and to enhance your user experience:

- **To provide and maintain services:** the primary purpose of collecting your personal data is to facilitate the provision and ongoing maintenance of our services. Your information is essential in ensuring the smooth functionality of our services, enabling a reliable and seamless user experience.
- **To communicate and support:** your personal data allows us to communicate effectively with you, responding to your queries, addressing concerns, and providing support. This ensures our issues are resolved promptly, allowing you to maximise the benefits of our services.
- **To enhance user experience:** by analysing user preferences and behaviours, we can tailor our services to better meet your individual needs. The information collected contributes to an improved and personalised user experience, enabling us to continuously enhance our service offerings based on feedback.
- **To improve our services:** your data provides valuable insights into how our services are performing, allowing us to identify areas for improvement. Analysing user patterns and feedback supports ongoing development and innovation, ensuring our services remain efficient and relevant.
- **To comply with legal obligations:** we may also use your data to fulfil our legal obligations, including compliance with regulatory requirements, fraud prevention, and ensuring the security of our platform and users.

DATA SECURITY

The security of your personal data is of utmost importance to us. We implement industry-standard security measures, including encryption and secure storage protocols, to protect your data from unauthorised access, disclosure, or destruction. Our systems are designed to safeguard your information from both internal and external threats, ensuring the ongoing confidentiality and integrity of your personal data.

DATA RETENTION

We retain your personal data only for as long as necessary to fulfil the purposes outlined in this Privacy Policy. Once those purposes have been met and there is no longer any legitimate reason to retain your data, it will be securely deleted. In some instances, we may be legally obliged to retain your data for a longer period.

Retention Periods:

- **Contractual Data:** retained for the duration of the contractual relationship and for a period of five years thereafter.
- **Marketing Data:** retained until you withdraw your consent to receive communications.

- **Website Analytics:** retained for up to 12 months, or longer if required by the Company's regulatory obligations.

In certain circumstances, we may be legally required to retain data for extended periods to safeguard our legal interests.

DATA BREACH NOTIFICATION

In the event of a personal data breach that may compromise your information, we are committed to notifying you without undue delay and will implement appropriate measures to mitigate any potential risks.

YOUR RIGHTS UNDER THE GDPR

Under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred as the "GDPR"), you have the following rights:

- **Right of Access (Article 15 GDPR):** You may request access to the personal data we hold about you.
- **Right to Rectification (Article 16 GDPR):** If any of your data is inaccurate or incomplete, you have the right to request its correction.
- **Right to Erasure (Article 17 GDPR):** You may request the deletion of your personal data when it is no longer required for its original purpose.
- **Right to Restriction of Processing (Article 18 GDPR):** You may request restriction of processing in certain circumstances.
- **Right to Data Portability (Article 20 GDPR):** You may request your personal data in a commonly used, machine-readable format for transfer to another service provider.
- **Right to Object (Article 21 GDPR):** You may object to the processing of your data under certain conditions.
- **Right to Withdraw Consent (Article 7(3) GDPR):** You have the right to withdraw your consent at any time.
- **Right to Lodge a Complaint (Article 77 GDPR):** You have the right to lodge a complaint with a supervisory authority.

To exercise any of these rights, please contact us using the details provided at the end of this policy.

DISCLOSURE OF INFORMATION

We are committed to transparency when sharing your data. While we generally do not share your personal data without your consent, there are instances where sharing is necessary to achieve the purposes set out in this Privacy Policy. This may involve sharing data with the following categories of recipients:

- **Service Providers:** Including IT infrastructure, customer support, and payment processors.
- **Legal and Regulatory Authorities:** Where required by law.
- **Business Partners and Affiliates:** As necessary for operational purposes.

Any sharing of personal data will always be conducted in compliance with legal requirements and with your explicit consent or another lawful basis.

COOKIES POLICY

We employ a variety of cookies on our Website to enhance its performance and improve your browsing experience. Below is a detailed explanation of the different categories of cookies we use and their purposes:

(a) Essential Cookies (also referred to as "Strictly Necessary Cookies")

Essential cookies are indispensable for the core functionalities of our Website, such as security, network management, and accessibility. These cookies are necessary for the Website to function

correctly and do not require your consent. Without them, fundamental features of the Website would not operate as intended, limiting your ability to use the Website effectively.

(b) Optional Cookies (also referred to as “Non-Essential Cookies”)

Optional cookies are employed to enhance your browsing experience by providing additional features, personalised content, and advertising functionalities. Although these cookies are not essential to the operation of the Website, they contribute to a more refined user experience. The types of optional cookies we use include:

- **Performance and Functionality Cookies:** These cookies enhance the performance and functionality of our Website, but are not strictly necessary for its operation. Without these cookies, certain functionalities may be limited, potentially affecting your user experience.
- **Analytics and Customisation Cookies:** We utilise these cookies to gather information on how our Website is used, allowing us to improve its performance continuously. They help us understand user behaviour, remember your preferences, and customise the Website to better meet your needs.
- **Advertising Cookies:** These cookies help ensure that advertisements displayed are more relevant to you. They prevent repetitive ads, ensure ads are served correctly, and in some instances, present ads based on your interests. Advertising cookies enable us to deliver more meaningful and targeted advertising content.

You can manage your cookie preferences via your browser settings; however, disabling certain cookies may reduce the functionality of some features on the Website.

Further details regarding our use of cookies can be found in our full Cookies Policy, available at <https://payments-lab.com/cookies.pdf>.

MARKETING AND OPTING OUT

We may process your personal data to send you marketing communications about products or services we believe may be of interest to you. If you prefer not to receive such communications, you may opt out at any time by following the instructions provided in the communication or by contacting us directly at dpa@payments-lab.com. Please note that even if you choose to opt out of marketing communications, we may still send you non-promotional messages relating to your account or transactions.

INTERNATIONAL DATA TRANSFERS

While we predominantly process personal data within the European Union and the European Economic Area (EU/EEA), there may be circumstances where your data needs to be transferred to a country outside the EU/EEA. In such cases, we ensure that appropriate safeguards are in place to provide an equivalent level of protection to your data as required under GDPR. These safeguards may include the use of **Standard Contractual Clauses (SCCs)** approved by the European Commission or other legally recognised mechanisms.

AUTOMATED DECISION-MAKING AND PROFILING

We do not use automated decision-making or profiling in our processing of your personal data.

CHILDREN'S DATA

Our services are not directed to individuals under the age of 16, and we do not knowingly collect personal data from children.

THIRD-PARTY LINKS

Our services may include links to third-party websites or services. Please be aware that we do not control the privacy practices or content of these external sites. We encourage you to review the privacy policies of any third-party websites before interacting with them, as we cannot be held responsible for their practices.

RIGHT TO LODGE A COMPLAINT

If you believe that we have not handled your personal data in accordance with the GDPR, you have the right to lodge a complaint with a supervisory authority. In Malta, the supervisory authority is the **Information and Data Protection Commissioner (IDPC)**.

You can contact the IDPC at:

Information and Data Protection Commissioner

Floor 2, Airways House,

High Street,

Sliema SLM 1549,

Malta

Tel: +356 2328 7100

Email: idpc.info@idpc.org.mt

Website: www.idpc.org.mt

UPDATES TO PRIVACY POLICY

We reserve the right to amend this Privacy Policy to reflect changes in our data processing practices or to address new privacy concerns. Any updates will be posted on our website, and in the event of significant changes affecting your rights, we may notify you directly. We encourage you to review this policy periodically to remain informed about how we handle your data.

CONTACT US

If you have any questions about this Privacy Policy or wish to exercise your data protection rights, please contact us at dpa@payments-lab.com.