

## **Data Protection Terms and Conditions**

### **(Privacy Policy)**

#### **Money transfers**

##### **Paysera**

### **1. General terms and conditions**

- 1.1 This document (hereinafter “**Data Protection Conditions**”) clarifies how ME Company OÜ, registry code 12961845; address Aia 5, Tallinn 10111, Estonia; telephone +372 6008250; e-mail [info@moneyexpress.ee](mailto:info@moneyexpress.ee), that provides financial services under the Moneyexpress trademark (hereinafter “**Moneyexpress**”) uses its customers’ personal data and ensures lawful processing, confidentiality, and security thereof.
- 1.2 Moneyexpress is liable for performance of its obligations and ensuring of security and fair processing of personal data by its employees and in its systems.
- 1.3 Moneyexpress processes personal data in adherence to the principles provided for in the General Data Protection Regulation, the Republic of Estonia Personal Data Protection Act, the Republic of Estonia Money Laundering and Terrorist Financing Prevention Act, other relevant legislation, and these Data Protection Conditions.
- 1.4 Moneyexpress provides money transfer services in cooperation with UAB Best Finance and MoneyGram International Limited, using to relevant end their money transfer systems Welsend, Koronapay, Contact, Privat Money (UAB Best Finance transfer systems), and Moneygram (Moneygram International Limited transfer system).
- 1.5 Relevant system operators are liable for security and fair processing of personal data by and in the systems of UAB Best Finance and Moneygram International Limited.
- 1.6 Persons wishing to use relevant money transfer service should also review the data protection conditions of UAB Best Finance and Moneygram International Limited.
- 1.1 UAB Best Finance data protection conditions are available at <https://bestfinance.eu/en-GB/privacy-policy>
- 1.7 Moneygram International Limited’s data protection conditions are available at <http://global.moneygram.com/privacy-notice>.
- 1.8 Moneyexpress offers the Paysera payment system in cooperation with Paysera LT, UAB.
- 1.9 Relevant system operator is liable for security and fair processing of personal data in the Paysera payment system.
- 1.10 Persons wishing to use the Paysera payment system service should also review the data protection conditions of the Paysera payment system service.
- 1.11 The Paysera payment system’s data protection conditions are available at <https://www.paysera.ee/v2/et-EE/juriidiline/puutumatusnormid>
- 1.12 Moneyexpress has the right to unilaterally amend these Data Protection Conditions at any time, disclosing a notice thereof on the web page [www.moneyexpress.ee](http://www.moneyexpress.ee).

### **1. Definitions:**

**Personal data** – any information on a natural person who has been identified or is identifiable

**Special categories of personal data** – personal data which reveal racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning a natural person's sex life or sexual orientation

**Biometric personal data** – personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data, eye iris images etc. (incl. photographs and copies thereof, personal data obtained by video recording)

**Customers** - Moneyexpress' customers that wish to use money transfer system services provided by Moneyexpress, incl. sending money or receiving sent money

**Receiver** - the person to whom the Customer sends money via the money transfer system

**Sender** – the person that sends money to the Customer via money transfer systems

**Representative** – the person that represents Moneyexpress' Customer in using relevant service

**Data subject** – an identifiable natural person. A person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physiological, genetic, mental, economic, cultural or social identity of that natural person. Foremost, data subjects are Moneyexpress' Customers, Senders, and Representatives.

**Controller I** – UAB Best Finance; registry code 304885975; address Mindaugo st. 1A-104,LT-03108 Vilnius; e-mail [info@bestfinace.lt](mailto:info@bestfinace.lt)

**Controller II** – Moneygram International Limited; registration number 502639; address 85 Queen Victoria Street, Senator House, London EC4V 4AB, United Kingdom

**Controller III** – Paysera LT, UAB; registration number 300060819; address Mėnulių g. 7, LT-04326 Vilnius, Lithuania; telephone +370 52071558

**Processor** – ME Company OÜ; registry code 12961845, Aia 5, Tallinn 10111, Estonia; telephone +372 6 008 250; e-mail [maxim@mec.lv](mailto:maxim@mec.lv)

**Third party** – a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data

**Processing** – any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

**Personal data breach** – a breach of security leading to the destruction, loss, or alteration as well as unauthorized disclosure of, or enabling of access to processed personal data

**2. Which Customer data does Moneyexpress collect?**

- 2.1 Forename and surname;
- 2.2 Sex;
- 2.3 Address;
- 2.4 Place of birth;
- 2.5 Profession or area of activity;
- 2.6 Nationality;
- 2.7 Type and number of identity document;
- 2.8 Copy of identity document (incl. copy of the information and picture on the document).
- 2.9 Data on the origin of funds; where funds originate from the Customer's salary, data on the amount of salary;
- 2.10 Moneyexpress collects data on whether a potential Customer, a Customer, or the beneficial owner is a politically exposed person or a person close to, a close associate of, or a family member of such a person.
- 2.11 Data obtained by video recording:
  - 2.11.1 Customer's facial image and facial expressions;
  - 2.11.2 Customer's behavior;
  - 2.11.3 Customer's movements;
  - 2.11.4 Customer's clothing.
- 2.12 Where the Customer is represented by a representative, data noted in items 3.1-3.11.4 is collected with regard to the representative.

**3. Which Receiver data does Moneyexpress collect?**

- 3.1 Forename and surname;
- 3.2 Telephone number;
- 3.3 Data on whether the Receiver is a politically exposed person or a person close to, a close associate of, or a family member of such a person;
- 3.4 Country of location.

**4. Which Sender data does Moneyexpress collect?**

- 4.1 Forename and surname.

**5. Where the Customer visits Moneyexpress' web page, Moneyexpress, for the purpose of performing its obligations arising from law, providing the service quality promised in relevant contract, and a more convenient service, and for the purpose of marketing, collects cookies in addition to data listed in item 2. The terms and conditions and procedure for the collection of cookies are available at <http://www.moneyexpress.ee/privaatsuspoliitika/>**

**6. For what does Moneyexpress use the Customer's personal data (purpose of processing of personal data)?**

- 6.1 Customer identification;
- 6.2 Disbursement of money sent to the Customer;
- 6.3 Sending of money by the Customer to another person;
- 6.4 Performance of requirements arising from the law;

- 6.5 Responding to queries by public institutions and governmental authorities;
- 6.6 Judicial cooperation with law enforcement authorities.
- 6.7 Video recording is used in currency exchange points to ensure security and quick dispute resolution.

**7. How and from where does Moneyexpress collect the Customer's personal data (source of collection of personal data)?**

- 7.1 Based on the Customer's relevant instruction, upon the Customer giving statements;
- 7.2 From the Customer's legal representative (incl. based on authorizations);
- 7.3 From the Customer's identity document;
- 7.4 During video surveillance. Video recording starts automatically upon the Customer's or potential Customer's movement at or in the vicinity of currency exchange points operated by Moneyexpress;
- 7.5 From third parties (public databases, marketing partners, social media etc.);
- 7.6 Through the browser used by the Customer as a visitor to Moneyexpress' web page (browser, device data, cookies etc.).

**8. On which basis does Moneyexpress process the Customer's personal data (basis for processing of personal data)?**

- 8.1 Moneyexpress processes data subjects' personal data for the purpose of:
  - 8.1.1 Performing the contract concluded with the Customer;
  - 8.1.2 Concluding a contract with a potential Customer or preparing a contract where a potential Customer proposed the conclusion of the contract;
  - 8.1.3 Performing obligations arising from legislation (foremost but not only the Republic of Estonia Money Laundering and Terrorist Financing Prevention Act).
  - 8.1.4 In the case of legitimate interest, Moneyexpress processes personal data collected during a video recording.
  - 8.1.5 Moneyexpress processes personal data collected during a visit to its web page where there is legitimate interest and for the purpose of compliance with a legal obligation.

**9. To whom does Moneyexpress forward/disclose the data subject's personal data?**

- 9.1 Moneyexpress forwards Customer data to the following persons:
  - 9.1.1 Controller I;
  - 9.1.2 Controller II;
  - 9.1.3 Controller III;
  - 9.1.4 Estonian Financial Supervision and Resolution Authority;
  - 9.1.5 Entitled public institutions and governmental authorities;
  - 9.1.6 Law enforcement authorities.

**10. For how long does Moneyexpress store personal data?**

- 10.1 Moneyexpress stores personal data for 7 (seven) years as of collecting the data.
- 10.2 Personal data collected during video surveillance is normally stored for 1 (one) month to 2 (two) months.

**10.3** The storage terms for data collected during use of Moneyexpress' web page are provided for in the principles on the use of cookies available at <http://www.moneyexpress.ee/privaatsuspoliitika/>.

**11. The Customer has the right to:**

- 11.1 Access their personal data and obtain printouts and copies regarding their personal data;
- 11.2 Request information on the types of data processed and the purpose of such processing;
- 11.3 Request rectification of their personal data where the data is incorrect or inaccurate;
- 11.4 Request erasure of their personal data where processing of the personal data is no longer necessary;
- 11.5 Request restriction of processing of their personal data where the Customer has submitted a request to have their personal data rectified or erased or where the Customer has contested the accuracy of the personal data processed;
- 11.6 Lodge a complaint with a data protection specialist by e-mailing [info@moneyexpress.ee](mailto:info@moneyexpress.ee);
- 11.7 Lodge a complaint with the Republic of Estonia Data Protection Inspectorate ([www.aki.ee](http://www.aki.ee), Väike-Ameerika 19, 10129 Tallinn, Estonia) where the Customer finds that processing of their personal data is not lawful.

**12. Moneyexpress' activities to ensure lawful processing and security of personal data**

- 12.1 In processing personal data, Moneyexpress is guided by the principles of lawfulness, transparency, purposefulness, and minimality as well as by data protection requirements prescribed by applicable law.
- 12.2 Moneyexpress processes personal data only for purposes described in item 6 of this document (For what does Moneyexpress use the Customer's personal data?).
- 12.3 Moneyexpress stores personal data only in such an extent which is necessary for purposeful processing of personal data.
- 12.4 Moneyexpress has employed physical and technological security measures to ensure lawful processing and protection of personal data.
- 12.5 Moneyexpress performs the Customer's information request or employs a measure requested by the Customer without delay, yet no later than within 30 (thirty) calendar days as of receipt of the information request. Where Moneyexpress finds that the information request is not legitimate, it informs the data subject thereof without delay, yet no later than within 30 (thirty) calendar days. Where performance of the data subject's information request is complex, the aforementioned term may be extended to no more than 60 (sixty) calendar days.
- 12.6 Moneyexpress performs the Customer's legitimate information request free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may charge a reasonable fee or refuse to act on the request.