

## Swaggybank Privacy Policy

**1.** For the purpose of compliance with the relevant data protection legislation, the party controlling your personal data is SatchelPay UAB (hereinafter – “Satchel”, “us” or “we“). This policy (together with our Customer Agreement and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please, read the following carefully to understand the types of information we collect from you, how we use that information and the circumstances under which we will share it with third parties. By visiting our website (“Website”) at [www.satchel.eu](http://www.satchel.eu) or using the Satchel mobile application (“App“) you are accepting and consenting to the practices described in this policy. Unless context otherwise requires, a reference to the Website shall be deemed to also refer to the App.

**2.** In order to show respect to your individual rights to privacy, Satchel processes the collected personal data in accordance with the Law on Legal Protection of Personal Data of the Republic of Lithuania, the General Data Protection Regulation and other legal acts such as the Directive No. 95/46/EC of the European Parliament. The employees, agents, and other parties who have access to your personal data are committed to ensuring its safety even upon termination of the contractual relationship.

**3.** It is possible that Satchel may engage data processors and third-parties, who will perform certain functions on behalf of Satchel. Satchel bears the responsibility to ensure that the latter treat sensitive data in compliance with the active legislation and given instructions. Satchel can also request certain security measures, and monitor their implementation. Under those circumstances, Satchel guarantees the imposition of the non-disclosure obligation, which will prevent parties from using information beyond the scale necessary to perform the given functions.

**4.** This Privacy Policy introduces the basic principles that Satchel follows when collecting, storing, and processing your personal data and other information related to you. It also outlays the aim of processing personal data, as well as the sources, recipients, and other important aspects of data processing in using the services of Satchel as a payment services provider

**5.** Providing personal data is necessary in order to continue using the services provided by Satchel. For instance, it is a required step in the Satchel account opening procedure. Personal data you provide is processed within the system in order to complete the established identification procedures.

**6.** By further proceeding with your activity on the website, you acknowledge and confirm that you

have familiarized yourself with the Privacy Policy, understood it, and agreed with its provisions. Satchel bears the right to update and revise the provisions, which implies that it is solely your responsibility to keep yourself familiarized with the latest version of this Privacy Policy.

## Purposes, Recipients, and Information we may collect about you

7. The core reason for data collection is provision of Satchel services to individuals who transact within the system. As a payment service provider, Satchel is required by law to establish and verify your identity before it begins to cooperate with you and provide any sort of financial services. Satchel has the right to store any initially and further requested information throughout the retention period estimated by the relevant legislation. Therefore, the Client is obliged to provide valid and complete information.

**8. PURPOSE: identification of Client's identity, provision of payment services (account opening, transfers of funds, payment collection and other), implementation of other legal obligations of the payment service provider.**

**8.1.** Personal data collected for the purposes listed above is processed within the following legal framework:

**8.1.1.** establishing and verifying the identity of the Client;

**8.1.2.** concluding agreements with the Client in order to proceed with fulfilling his requests;

**8.1.3.** executing financial transfers in compliance with legislation;

**8.1.4.** following the "Know Your Client" provisions;

**8.1.5.** conducting systematic monitoring;

**8.1.6.** carrying out risk assessment;

**8.1.7.** ensuring the accuracy of data provided by the Client;

**8.1.8.** preventing possible money laundering, terrorist financing, and fraud; timely detecting, profoundly investigating and informing of such activity, acting in accordance with financial sanctions imposed on the Client;

**8.1.9.** effective performing of risk and organization management.

**8.2.** The processing of the following data is a priority in accordance with above listed provisions: name, surname, personal identification number, address, date of birth, identity document information, photo, direct video transmission recording, citizenship, email address, phone number, payment account number,

IP address, current activity, current public function, and any other data required by the Law on Prevention of Money Laundering and Terrorist Financing.

**8.3.** The relevant information is collected and processed on the grounds of a legal obligation imposed on Satchel as the payment service provider by the Law on Payments of the Republic of Lithuania, the Law on Electronic Money and Electronic Money Institutions of the Republic of Lithuania and the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania. Therefore, in order to open an account and/or use the payment services of Satchel, the Client is obliged to provide a full set of requested documents.

**8.4.** Parties that might be among the recipients of Client-related data:

**8.4.1.** supervisory authorities;

**8.4.2.** credit, financial, payment and/or electronic money institutions (subject to the Customer's consent and in the scope of the Personal data solely specified by the Customer);

**8.4.3.** pre-trial investigation institutions;

**8.4.4.** the State Tax Inspectorate;

**8.4.5.** payment service agents or other representatives of Satchel (if their services are essential for carrying-out an operation);

**8.4.6.** beneficiaries of transaction funds receiving the information in payment statements together with the funds of the transaction;

**8.4.7.** debt collection and recovery agencies;

**8.4.8.** companies processing consolidated debtor files;

**8.4.9.** lawyers and law firms;

**8.4.10.** auditors;

**8.4.11.** credit / debit card processing service providers;

**8.4.12.** identity verification service providers;

**8.4.13.** sanction / PEP screening providers;

**8.4.14.** vendors of software development and support services;

**8.4.15.** transaction monitoring service providers;

**8.4.16.** risk management tools providers;

**8.4.17.** website domain hosting providers;

**8.4.18.** cloud service providers;

**8.4.19.** other Satchel suppliers with the purpose of proper fulfillment of Satchel services.

**8.5.** Clients' Personal data may be transmitted to third parties not specified above for specified and legitimate purposes only, and only to third parties who have the right established by laws and other legal acts to receive personal data in the countries of the European Union and the European Economic Area. When the processing of Customer information described above may involve sending it to countries outside of the EEA, Satchel will take all reasonable steps to ensure that the Clients' data is treated securely and in accordance with this Policy.

## **9. PURPOSE: Debt management.**

**9.1.** Under this provision, Client-related information is processed in order to manage issues related to debt collection, submission of claims, demands, lawsuits and other documents.

**9.2.** Processing of the following data can be involved: name, surname, personal identification number, address, date of birth, data from an identity document, email address, phone number, payment account

number, IP address, payment account statements.

**9.3.** Groups of data recipients: companies processing consolidated debtor files, credit, financial, payment and/or electronic money institutions, lawyers, courts, pre-trial investigation institutions, the State Tax Inspectorate, debt collection and recovery agencies, other entities having a legitimate interest.

**9.4.** Third countries may also obtain access to the data, yet only in the case it/its national is directly involved in your payment transfer execution.

## **10. PURPOSE: Supporting and managing relations with Clients, preventing disputes and collecting evidence (recording phone conversations), correspondence of business relations with the client.**

**10.1.** Processing of Client's data can be involved for reasons of:

**10.1.1.** protecting the interests of the Client and/or Satchel;

**10.1.2.** preventing disputes, providing evidence of business communication with the client (recordings of conversations, correspondence);

**10.1.3.** ensuring the top-level quality of services provided by Satchel;

**10.1.4.** executing Client's requests, following the obligations levied by law or other legal documents.

**10.2.** The following Client-related information may be processed: name, surname, address, date of birth, email address, phone number, IP address, payment account statements, phone conversation recordings, correspondence with the client.

**10.3.** Data recipients: supervisory authorities, companies processing consolidated debtor files, lawyers, bailiffs, courts, pre-trial investigation institutions, debt collection and recovery agencies, other entities having a legitimate interest, other entities under an agreement with Satchel, strictly upon reception of a separate consent from you.

**10.4.** No third country may be granted access to such data.

**11. PURPOSE: Informing the client about services. In this case, Client's data is processed in order to inform the Client about the services provided by Satchel, their prices, specifics, for sending system and other messages related to the services provision by Satchel.**

**11.1.** This provision implies processing of the following Client's data: email address, phone number.

**11.2.** The Client hereby acknowledges and agrees that he/she is aware that such messages shall be perceived as necessary under the General Payment Service Agreement and/or its supplements concluded with the Client, which differentiates them from direct marketing messages.

**11.3.** Data recipients: no third-party shall receive access to data described in this provision.

**12. PURPOSE: Direct marketing.** In this case, Client's data is processed in order to inform the Client concerning the offers related to services provided by Satchel.

**12.1.** This provision implies processing of the following Client's data: email address, phone number.

**12.2.** With this provision the Client acknowledges and confirms that he/she is aware of the fact that the data listed above may be processed for the purpose of direct marketing. The Client maintains the right to disagree and to object this clause at any time by informing Satchel via email to info@satchel.eu. The email must provide valid information necessary to identify the data subject.

**12.3.** Data recipients: The procedure of data processing may involve search or social networking systems (objections to data processing may be filed within the framework that the

websites of these systems provide). No other persons shall receive access to data described in this provision.

**13.** Personal data collected for the purposes specified in this Privacy Policy will only be processed for legitimate purposes in ways complying with legal requirements.

**14.** No third-party shall be granted access to the Client-related data marked as “personal” without prior Client’s consent. Situations when it is required to do so by applicable law or for the purpose of services provision shall be viewed as exception.

## Profiling

**15.** Satchel may use automated means of personal data processing, following the provisions of risk management-related legislation, and systematic monitoring of transactions with the goal of fraud prevention; such profiling is justified by legitimate interests and legal duties of Satchel.

**16.** Following the aims of direct marketing and statistical analysis, Satchel may perform profiling through the use of Google, Facebook and other analytics tools.

## Cookie policy

**17.** Cookies are used in order to distinguish you from other users of Satchel Website. This helps to

ensure your pleasant experience when navigating Satchel Website and also allows improving its organisation. In technical terms, cookies are small files containing a string of characters that are sent to a person’s computer upon visiting the website. Cookies allow the Website to recognize a person’s browser upon the next visit to the Website, and may detect user preferences and other information.

### Used Cookies

Name	Description
_hjClosedSurveyInvites	Hotjar cookie. This cookie interacts with a Survey in popup. It is used to ensure does not re-appear if it has been shown.
_hjDonePolls	Hotjar cookie. This cookie completes a poll using the widget. It is used to ensure does not re-appear if it has been in.
_hjMinimizedPolls	Hotjar cookie. This cookie minimizes a Feedback Pop to ensure that the widget when the visitor navigates.
_hjDoneTestersWidgets	Hotjar cookie. This cookie submits their information Testers widget. It is used same form does not re-appear been filled in.
_hjIncludedInSample	Hotjar cookie. This session Hotjar know whether that the sample which is used

<p>_hjShownFeedbackMessage</p>	<p>This cookie is set when a visitor minimizes or completes Incoming Feedback. This is done so that the Incoming Feedback will load as minimized immediately if they navigate to another page where it is set to show</p>	<p>365 days</p>	<p>The cookie is set so Hotjar begins the user's session count. It does not store identifiable information.</p>
<p>_hjid</p>	<p>Hotjar cookie. This customer first lands script. It is used to provide a unique to that site or ensures that behavior the same site will be user ID.</p>	<p><b>18.</b> Like most website managers, Satchel monitors traffic of the website and automatically collects information on the number of visitors browsing the website, the domain name of Internet service providers of visitors, etc. Such cookies are required for technical reasons in order to ensure the sound and efficient Website operation (administer the Website, maintain security, measure or understand the effectiveness of advertising etc.), as well as track and target the interests of users and Clients in order to improve their experience.</p> <p><b>19.</b> The person visiting the Satchel Website automatically agrees to the cookie policy unless indicates otherwise through altering the settings.</p> <p><b>20.</b> In case of altering the settings, the functionality of the Website may change.</p> <p><b>Restriction of data processing</b></p> <p><b>21.</b> You have the following rights</p> <p><b>21.1. THE RIGHT OF ACCESS TO DATA:</b> to be informed as to whether or not Satchel is processing your personal data, and access to the related information.</p>	
<p>_hjRecordingLastActivity</p>	<p>This should be found (opposed to cookies) visitor recording station through the WebSocial an action that Hotjar</p>		
<p>hjTLDDTest</p>	<p>When the Hotjar script determine the most should use, instead of is done so that cookies subdomains (where this, we try to store for different URL sites it fails. After this change removed.</p>		
<p>_hjUserAttributesHash</p>	<p>User Attributes sent Identify API are cached session in order to be changed and needs to</p>		
<p>_hjCachedUserAttributes</p>	<p>This cookie stores User sent through the Hotjar whenever the user interacts with a Hotjar</p>		
<p>_hjLocalStorageTest</p>	<p>This cookie is used Tracking Script can a value of 1 is set in stored in _hjLocalStorage expiration time, but after creating it so that under 100ms.</p>		
<p>_hjptid</p>	<p>This cookie is set for Hotjar, who have Analytics permissions. It is used experiments to show pricing across the site</p>		

**21.2. THE RIGHT TO RESTRICTION OF PROCESSING:** you have the right to ask us not to process your personal data for marketing purposes by contacting us at [info@satchel.eu](mailto:info@satchel.eu)

**21.3.** If, for whatever reasons, you believe that the processing of your personal data is taking place under conditions of violation of your rights and legitimate interests protected by applicable legislation, you may address the supervisory authority.

**22.** You are free to contact Satchel in case you are willing to learn details, or voice an objection to data processing via email at [info@satchel.eu](mailto:info@satchel.eu). The individual communicating must provide information that will enable the identification of his/her identity, along with a copy of a personal identification document or an electronic signature.

## **Unrelated websites**

**23.** Satchel bears no responsibility for ensuring protection of Client's sensitive data on unrelated third-party websites, even in case these websites were accessed through a link provided on the Satchel Website. Activity on such websites is regulated by their individual Privacy Policy.

## **Information security**

**24.** It is a priority of Satchel to provide highest-level security to our Clients concerning all the information and sensitive data we receive access to. Relevant legal, administrative, technical and physical security measures are undertaken in order to protect this information from unauthorized access, use, copying, accidental or unlawful erasure, alternation, or disclosure, as well as from any other unauthorized form of processing.

## **Law and jurisdiction**

**25.** These Privacy policy provisions are subject to the law of the Republic of Lithuania. All disputes regarding the provisions of the Privacy Policy shall be settled by negotiation and, in case of failure, the dispute shall be taken to courts of the Republic of Lithuania.

**26.** For the purpose of the relevant data protection legislation, the data controller is SatchelPay UAB of Geležinio vilko g. 18A, Vilnius, LT-08104, Lithuania.