

## Privacy Policy & Data Protection

KANTOX Limited (“KANTOX” or “We”) is fully committed to safeguarding your privacy online or otherwise and the success of our business depends upon our ability to maintain the trust of our clients. As part of our day to day business operations we collect certain personal information about our clients. This privacy policy aims to provide a summary of the type of information we collect and how the information is used. The policy does not cover any external third party websites that may be accessed through the links provided on our website.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is KANTOX Ltd Longcroft House | 2-8 Victoria Avenue | London EC2M 4NS | UK

### 1. Information we may collect from you

We may collect and process the following data about you:

Information that you provide by filling in forms on our site [www.kantox.com](http://www.kantox.com) (our site). This includes information provided at the time of registering to use our site, subscribing to and using our service, posting material or requesting further services. We may also ask you for information when we process your application to use our services, when we deliver services to you, and when you report a problem with our site.

If you contact us, we may keep a record of that correspondence.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

Details of transactions you carry out through our site or service and that we process for you. Such information may include payment amounts, and personal details of persons to whom you are sending payments. Those persons may also give us their personal information. We retain such information for each of your transactions using our service, and may add it to your account profile for use in relation to future transactions made through our service.

The IP address of your computer and other information about the device you use to access our service, from which you may be identifiable. We retain this information to detect unauthorised transactions.

Details of your visits to our site including, but

not limited to, traffic data, location data, weblogs and other communication data, whether this is required for purposes of providing you with our services or otherwise and the resources that you access.

The above information about you may include your name, address, phone number and email address, client's business name, registration number, business address, copies of ID of directors, director's name, director's date of birth, employment details and information relating to your financial circumstances. In order for us to provide our payment processing services to you, you must provide bank account information, and “know your client” information, password information, and responses to security questions. In addition to the “know your client” information you provide when you apply for an account with KANTOX, we may ask you for further identification information in the course of providing services to you, in particular, if you send or receive high value payments, or to comply with our anti-money laundering regulations.

### 2. Information we may collect from third parties

In order to protect our customers against potential fraud, we may verify the information that you provide to us with other payment processors, banks, credit reference agencies, fraud checking agencies, providers of operational services, and regulators, such as the Financial Services Authority.

As described above, we may collect personal information about our customers' payees, in order to remit payments to them. We will retain this information to keep a record of the transactions, for ourselves and for provision to

our customer who requested the payment. Such payees are entitled to access and correct the information about themselves.

### 3. IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer, or similar technologies for storing or retrieving information such as local shared objects (often referred to as "flash cookies"), web beacons or web bugs (including transparent or clear gifs).

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow us to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide.

Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.
- To generate your email or other personal details on your registration from or other on-line documents to save you re-typing them;

- Identifying you when you sign-in to any secured part of our site. This allows us to store your login credentials, and to remember any application settings you may define ;
- Tracking the use of our web sites, for the purpose of improving our service offering to you.
- Improving security.

According to ICC UK Cookie guide, cookies may be categorised in the following categories:

- **Category 1: Essential Cookies.** These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for cannot be provided. **We remind you that under current law, cookies from category 1 are strictly necessary and as such your consent for use is not required;**
- **Category 2: Performance Cookies.** These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works. **By using our website, you agree that we can place these cookies from Category 2 on your device;**
- **Category 3: Functionality Cookies.** These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. **By using our website, you agree that we can place these cookies from Category 3 on your device;**
- **Category 4: targeting cookies or advertising cookies.** These cookies are used to deliver adverts more relevant to you and your interests They are also used to limit the

number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation. **By using our website, you agree that we can place these cookies from Category 4 on your device.**

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site

#### 4 Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our site. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

#### 5 Where we store your personal data

The data that 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 for one of our suppliers. Such staff may be

engaged in, among other things, the processing of your payment transactions 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 privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, or to use our services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Our representatives will not ask you for your password, so any communication or telephone or other request for your password should be treated with suspicion and reported to us at support@kantox.com If you believe that someone else has obtained access to your password, please also change it as soon as you can by logging into your account and changing your customer details.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### 6 Uses made of the information

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- To resolve disputes and to deal with queries about our services.

- For fraud detection and prevention purposes.

We may also use your data, or permit selected third parties to use your data, to provide you with information about products and services which may be of interest to you and we or they may contact you about these by post or telephone.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the application form).

## 7 Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

In the event that we establish a members' area on our website, we may display your name and contact details there, as well as any content you provide in this connection.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If KANTOX or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of KANTOX, our customers, or others. This includes exchanging information with other

companies and organisations for the purposes of fraud detection and credit risk reduction.

We may share your information with:

- Merchants, other payment processors, banks, fraud checking agencies and providers of operational services, including outside the EEA, in order to provide our services to you, including transmitting payments and also to fulfil our obligations to them under our contracts with them relating to the services we provide to our customers.
- The persons mentioned above and with credit reference agencies and regulators, such as the Financial Services Authority or tax authorities or security and law enforcement agencies, including outside the EEA, for fraud detection and prevention purposes and in connection with their exercise of their regulatory functions.
- Third parties in connection with civil or criminal legal proceedings.

## 8 Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting Laurent Descout, Head of Compliance, [laurent.descout@kantox.com](mailto:laurent.descout@kantox.com), +44 20 8133 3531, or [laurent.descout@kantox.com](mailto:laurent.descout@kantox.com)

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 9 Complaints or queries

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or

inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

## **9 Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about

you.

## **10 Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## **11 Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Laurent Descout, Head of Compliance, KANTOX Ltd Longcroft House | 2-8 Victoria Avenue | London EC2M 4NS | UK , +44 20 8133 3531, or [laurent.descout@kantox.com](mailto:laurent.descout@kantox.com)