

# Privacy Policy

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## 1. Introduction

In order to operate the Profee e-wallets and to reduce the risk of fraud, the data controller of Sibilla Solutions Ltd ("Sibilla", the "Company", "our", "us" or "we"), must ask you to provide us with information about yourself, including your mobile phone number and/or bank account details. By consenting to, and agreeing the terms of, this Privacy Policy, you expressly consent and agree to us processing your data in the manner set out herein. This Privacy Policy describes the information we collect and how we use that information. Sibilla takes the processing of your information very seriously and will use your information only in accordance with the terms of this Privacy Policy. For the purposes of this Privacy Policy, the term "information" means any confidential and/or personally identifiable information or other information related to users of Profee e-wallets, including but not limited to customers and merchants (legal entities) (collectively referred to as "Clients"). This statement applies to all personal data in our possession ("Your Data").

We are committed to respecting your privacy and to complying with all the provisions of the General Data Protection Regulation (GDPR) and all other applicable data protection and privacy laws and regulations. The purpose of this Privacy Policy is to set out how we obtain and use your personal information when you visit [www.profee.com](http://www.profee.com) (the "Website") and when you generally use our product and related services. This Privacy Policy does not apply to websites operated by other organisations and other third parties, therefore we advise you to check the privacy policies of any such websites before providing any data to them.

Privacy Policy forms part of our Terms & Conditions and sets out the basis on which we collect and process Your Data in the course of providing this service. By using such services, you agree that we may process Your



Data as set out in those Terms & Conditions.

This Privacy Policy will be reviewed as necessary, at our sole discretion, to keep pace with any applicable laws and regulation. When reissued, changes will be highlighted so that you are aware of the amendments. We may change this Privacy Policy at any time by posting a revised version of it on the Website and will be deemed as received by all Clients. Unless we have legal grounds to do otherwise, we will provide you with at least 30 days' prior notice of the effective date of the revised privacy policy. We will inform you about changes to this Privacy Policy by posting a notice on our website(s) and/or send the notice by e-mail. As of the effective date of the revised privacy policy, you will be considered as having consented to all changes to the Privacy Policy therefore we recommend that you check this page regularly to keep up-to-date. Do not register for any of the Profee services if you are in disagreement with this Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time by giving us respective notice.

For the avoidance of doubt, this Privacy Policy does not constitute a "framework contract" for the purpose of the EU Payment Services Directive (2007/64/EC) or any implementation of that directive in the European Union or EEA (including, without limitation, the UK Payment Services Regulations 2009).

**Note:** Children are not eligible to use Profee e-wallets and we ask that minors (persons under the age of 18) do not submit any personal information to us or use the Profee e-wallets.

## 2. Information Sibilla Collects from Clients

In order to open an account with Profee (or use the Profee e-wallets), you must first complete and submit an online application form by completing the required information. By completing the relevant application form, you are requested to disclose personal information in order to enable us to evaluate your application and comply with relevant rules and regulations. When an application is submitted, we are required by law to verify the client's identity as well as the rest of the information provided and conduct appropriate research against any possible fraud/money laundering/crime issues and risks.

As part of the registration with Profee service, users **must provide their name, Country of residence, residential address, date and place of birth, mobile phone number, e-mail address and nationality**. We also ask you to choose a security question to answer and provide a password to your account.

**We will also require other commercial and/or identification information (for example, a valid passport) if you send or receive certain high-value transactions** or high overall payment volumes through the Profee e-wallets or as is otherwise required in order for us to comply with our anti-money laundering obligations under the European legislation framework.

### 2.1 Additional Information We Collect from Clients

When you use the Profee e-wallets to send money to someone else or request money from someone else, we ask you to provide information related to that transaction. This information includes the amount and type of the transaction (purchase of goods, purchase of services, or simple money transfer), other purchase details and the e-mail address, or mobile phone number of the third party. Also, when you send money to another Profee customer, you may be asked to provide identification details to that customer to complete the transaction. Those details may also be passed on to us from that customer.

We also collect the Internet address (IP address) and other identifying information about the computer or device you use to access your Profee account or use the Profee e-wallets, in order to help detect possible instances of unauthorised transactions.

If you send or receive high overall payment volumes (over €1.000 or at a lower amount if the Company is not satisfied with your identification information) through the Profee e-wallets, or if as a merchant have limited selling history, in some circumstances we will conduct a background check on your business by obtaining information about you and your business, and potentially (if legally permitted) also about your directors, shareholders and partners, from a credit reference or fraud agency. If you owe us money, we may conduct a credit check on you by obtaining additional information about you from a credit reference or fraud agency, to the extent permitted by applicable laws. Sibilla, at its sole discretion, reserves the right to periodically retrieve and review a business and/or consumer credit report supplied by such credit reference or fraud agency for any account, and reserves the right to close an account based on information obtained during this credit review process.

Finally, we also collect information for system administration about the client's computer or device, including



where it is available, IP Address, operating system and browser type. This is statistical data about the users' browsing behaviour (actions and patterns) while visiting the Website and does not identify any individual.

## 2.2 How Information is Collected

We will always ensure that Your Data is obtained lawfully, fairly and in a transparent manner. We will do this by providing you with the necessary information in a clear manner so that you can determine the purposes for which your information will be used at any given time. We will collect Your Data through a number of different channels including, but not limited to, where you directly provide personal details when you:

- Purchase products or services from us (irrespective of the means used for the purchase);
- Register your details to become a client (user of Profee);
- Submit enquiries to us or contact us in general;
- Participate in any promotions, competitions or prize draws;
- Use any of our products or services;
- Take part in any form of a market research;
- Close your account maintained with us; and
- Visit or browse the Website, related micro-sites or other websites of affiliated companies.

## 2.3 Alternative Methods of Collecting Information

Moreover, information about you may also be collected by any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our Website, subscribe to our service or any other activities carried out on our Website or any connected applications.

We may also collect Your Data from other sources including, but not limited to:

- Credit reference and fraud prevention agencies;
- Sibilla's affiliated companies, other companies (subject to their privacy policy and applicable legislation) and from other accounts we have reason to believe you control (whether partially or fully);
- Business directories and other commercially or publicly available sources; and
- Other financial or payment institutions.

## 2.4 Additional Verification

If we cannot verify the information that you provide, or if you request a withdrawal to a bank account or an address other than your verified ones, we may ask you to upload or send us additional information by post or e-mail or fax (such as your recent utility bill, or other information linking you to the applicable address), or to answer additional questions online to help verify your information. In such assessment process, we may use a variety of information sources that do not violate the provisions of the GDPR or any other applicable personal information privacy rules. Furthermore, Client provided information may be verified with third party providers such as but not limited to payment processors as a measure to enhance the Clients' protection.

## 3. Confidentiality and Clients' Personal Data Protection

Sibilla is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus; therefore, any Clients' personal data is kept by us in accordance with the General Data Protection Regulation (EU Regulation 2016/679) and the provisions of the Processing of Personal Data (Protection of the Individual) Law of 2001, its amendment (Law No. 37(I)/2003) and the Processing of Person Data (Protection of Individual) (Amending) Law of 2012 (Law No. 105(I)/2012) and the Regulation of Electronic Communications.

Clients accept and consent that Sibilla may, from time to time, contractually engage companies for statistical and/or other purposes in order to improve Sibilla's business activities; as a result, some or all of the Clients' collected data may be disclosed. The data that will be used for such purposes would not be in an identifiable form.



## 3.1 Storage of Clients' Personal Data

All information provided by Clients to Sibilla is stored on our secure servers which are located within the European Economic Area (the "EEA"). The EEA consists of all EU members states, plus Norway, Iceland and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards provided by the Law. Hard copies provided by merchants are also stored as such in our secured filing room located at our Cyprus office registered address.

As the transmission of information via the internet is not completely secured, we cannot guarantee the security of the data the Clients transmit to the Website and therefore any transmission is at the client's own risk. Once the client's information is received, Sibilla will use strict procedures and security features to try to prevent any unauthorized access.

## 4. How We Use the Information We Collect

We will use Your Data only for the purpose for which it was originally provided and where we intend to use it for any other purpose, we will explicitly notify you and where appropriate to seek your prior consent. Your Data will be used by us for a safe, effective, efficient, and customised experience, as well as routine account maintenance. Your Personal Data will be used for one or all or any of the following ways (not exhaustive list):

- Process transactions and provide the Profee service;
- Carry out any other obligation arising from any contracts entered into between the client and Sibilla;
- Verify that you are an authorised user for security purposes;
- Combat money laundering and terrorist financing;
- Assist us with crime and fraud prevention;
- Provide you with customer support services;
- Improve our services by customising your user experience;
- Manage and protect our information technology infrastructure;
- Resolve disputes, collect fees, and troubleshoot problems;
- Analyse markets and produce reports, perform research and statistical analysis and to monitor user behaviour to improve our technologies and services;
- Inform you of any products and services offered by other companies that we think may be of interest to you (given that you have consented to be contacted for such purposes); and
- Notify the client about changes to Sibilla's service and/or changes made to this Privacy Policy.

## 5. How Long we will Keep your Personal Data

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. We are however required to keep your personal data for a minimum period of five (5) years after the closing of your account in order for us to comply with our anti-money laundering obligations under the European legislation framework.

## 6. Sharing of your Personal Data

We may share Your Data with any affiliated company, which means any subsidiaries, ultimate holding companies and its respective subsidiaries may receive such information. Where we share your data with our affiliated companies, we ensure that all personal data is protected by requiring all of our affiliates to follow the same rules with respect to personal data usage. These are known as "binding corporate rules" and more information about them is available from the European Commission. We may also share your information with certain third parties including business partners, suppliers and subcontractors. If you wish to receive more information about these third parties, you can contact our Data Protection Officer at [dpo@profee.com](mailto:dpo@profee.com). We use specific contracts with external third parties that are approved by the European Commission (with the use of the "Standard Contractual Clauses" as approved by the European Commission) for the transfer of personal data to third countries that are not part of the EEA. These contracts ensure the same levels of personal data



protection that would apply under the GDPR. Where we transfer data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection standards similar to those in Europe. More information can be found here <https://www.privacyshield.gov/welcome>. In the event that Sibilla discloses information to business parties, for instance, card processing companies or banks, in order to effect the services requested by the Clients, such third parties may store your information in order to comply with their legal and other obligations.

## 6.1 Sharing Information with Other Profee Users

If you are a registered Profee user, your name, e-mail address, phone number (if applicable) date of sign-up, or other data are made available to other Profee users whom you have paid or senders who are attempting to pay you using the Profee e-wallets. If you are a merchant, we will also display to other Profee users the website address (URL) and customer service contact information that you provide us. In addition, this and other information may also be shared with third parties when you use these third parties to access the Profee services. However, any of your financial information (such as your bank account) will not be revealed to anyone whom you have paid or who has paid you through the Profee e-wallets or third parties that use the Profee e-wallets, except with your express permission or if we are required to do so pursuant to a court order, International Payment Systems and Acquiring rules or other legal process.

If you are buying goods or services and pay through your Profee account, we may provide the seller with the delivery address for the goods and your billing address to complete your transaction. If an attempt to pay your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful payment. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

If you use Profee as means of logging into external websites, we may share your login status with any third party offering this Service as a login method, as well as the personal and other Account Information that you consent to being shared so that the third party can recognise you. Sibilla will not give such third party access to your Profee account and will only make payments from your account to that third party with your specific authorisation. You can access, view and control the settings for any such data sharing with merchants when logged into your Profee account.

We work with third parties including merchants to enable them to accept or facilitate payments from or to you using the Profee services. In doing so, a third party may share information about you with us such as your e-mail address or mobile phone number, when a payment is sent to you or when you are attempting to pay that third party. We use this information to confirm that you are a registered client and that Sibilla can be enabled to make a payment, or where a payment is sent to you to send you a notification that you have received a payment. Also, if you request that we validate your status as a Profee user with a third party, we will do so. Please note that third parties you buy from and contract with may have their own privacy policies, and Sibilla is not responsible for their operations, including but not limited to their information practices.

By accepting this Privacy Policy, you expressly agree and consent that each time you pay or attempt to pay another Profee user (including a merchant) using your Profee account, we may transfer the aforementioned relevant data to such Profee user, who may be located outside the European Economic Area (EEA), in order to process, execute or otherwise deal with and provide information about the payment. When your personal data is shared with other Profee users who are located outside the EEA, the following safeguard(s) are applied to such transfers: request for OTP verification.

## 6.2 Sharing Personal Data with Other Third Parties

We will not sell or rent any of your personal information to third parties for their marketing purposes without your explicit consent, and will only disclose this information in the limited circumstances and for the purposes described in this Privacy Policy. This includes transfers of data to non-EEA member states. Under such circumstances, Sibilla shall expressly inform the third party regarding the confidential nature of the information.

Specifically, Sibilla may disclose Your Data to third parties under the following circumstances:

- If we are required to do so by a regulatory authority of a competent jurisdiction; the police and other law enforcement agencies; security forces; competent governmental, intergovernmental or supranational bodies; competent agencies (other than tax related authorities), departments, regulatory authorities, self-regulatory authorities or organisations and other third parties, including companies



affiliated to Sibilla, that we have reason to believe it is appropriate for us to cooperate with in investigations of fraud or other illegal activity or potential illegal activity, or to conduct investigations of violations of our Terms & Conditions (including without limitation, your funding source or credit or debit card provider). We will attempt, to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. We and other organisations, including parties that accept Profee, may also share, access and use (including from other countries) necessary information (including, without limitation the information recorded by fraud prevention agencies) to help us and them assess and to manage risk (including, without limitation, to prevent fraud, money laundering and terrorist financing).

- In response to requirements of the credit card associations or a civil or criminal legal process.
- If you as a merchant use a third party to access or integrate Profee, we may disclose to any such partner necessary information for the purpose of facilitating and maintaining such an arrangement (including, without limitation, the status of your Profee integration, whether you have an active Profee account and whether you may already be working with a different Profee integration partner).
- Disclose necessary information to the payment processors, auditors, customer services providers, credit reference and fraud agencies, financial products providers, commercial partners, marketing and public relations companies, operational services providers, group companies, agencies, marketplaces and other third parties listed here. The purpose of this disclosure is to allow us to provide Profee services to you.
- Disclose necessary information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
- Disclose aggregated statistical data with our business partners or for public relations. For example, we may disclose the location of a specific percentage of our users, or the industry that is mostly used by our customers to conduct payments. However, this aggregated information is not tied to personal information and cannot lead to any user being identified.
- If Sibilla sells or buys any business or assets in which case, we may disclose Your Data to the prospective seller or buyer of such business or assets.
- If Sibilla or substantially all of Sibilla's assets are acquired by, or merged with, a third party in which case any personal data held about Clients will be considered as one of the transferred assets. If such an acquisition/merger occurs, we will inform you and accordingly obtain your consent to the successor company having access to Your Data maintained by us, including customer Account Information, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

## 7. Your Rights Under The GDPR

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more to ask any questions using the contact details provided for at the end of this privacy policy.
- b) The right to access your personal data we hold about you. Part 8 below will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. To do this, please make use of the contact details provided for this purpose at the end of this privacy policy.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Again, you may use the contact details provided at the end of this privacy policy to learn more about this right and to ask for your personal data to be deleted. We are unable to proceed with erasure requests prior to the expiry of the five (5) year period following the closing of your account and/or the termination of our contract with you, as such action will affect our ability to comply with our anti-money laundering obligations under the European legislation framework.
- e) The right to restrict (i.e. prevent) the processing of your personal data.



- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means if you have provided personal data to us directly, or we are using it with your consent or for the performance of your contract with us, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision making and profiling. We do not use your personal data in this way. Further information about your rights can also be obtained from the office of the Commissioner for Personal Data Protection of the Republic of Cyprus or your local Information Commissioner's Office.

## 8. How to Access Your Data

If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where such personal data is held) This is known as a "subject access request".

All subject access requests should be made in writing and sent to the following email address [compliance@profee.com](mailto:compliance@profee.com). There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example if you make repetitive requests) a fee may be charged to cover for administrative costs in responding.

We will respond to your subject access request within 15 days and in any case not more than one month from receiving it. Normally, we aim to provide complete response, including copy of your personal data within that time. In some case however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our process.

## 9. Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Website uses cookies to distinguish a client from other users of the Website. This helps to provide the client with a good service when browsing the Website. It further allows Sibilla to improve the quality of the service offered.

Sibilla uses both session ID cookies and persistent cookies. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You have the ability to accept or decline cookies. All cookies used by Sibilla on the Pro-Fee site are used in accordance with current cookie Law. Certain features on our website depend on cookies to function. Cookie Law deems these cookies to be strictly necessary. Before cookies are placed on your computer or device you will be shown a message requesting you to consent to set those Cookies. If you decline cookies, some aspects of the Website may not work on your PC and/or device and you may not be able to access areas you want on the Website. Thus, we recommend that you accept cookies. We will not store any sensitive information relating to you or your user account in a cookie.

Some of our business partners use cookies on the Website; Sibilla has no access or control over these cookies.

For further information on Cookies and how you can adjust your browser settings in relation to Cookies, please see our Cookies Policy [here](#).

## 10. Information Security

The Company is committed to handling your information with high standards of information security. We use computer safeguards such as firewalls and data encryption. We enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfil their day-to-day operations.

The security of your Profee account also relies on your protection of your Profee password. You should not share your Profee password with anyone. Our representatives will never ask you for your password, so any e-mail or other communication requesting your password should be treated as unauthorised and suspicious and forwarded to our support team on: [help@profee.com](mailto:help@profee.com).

In the event that you share your Profee password with a third party for any reason, the third party will have access to your account and your personal information, you are responsible for any actions taken using your



password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also contact our support team immediately at [help@profee.com](mailto:help@profee.com).

## 11. Legal Disclaimer

Sibilla reserves the right to disclose your personally identifiable information as required by rules and regulations and when we believe that disclosure is necessary to protect our rights and/or to comply with any judicial and/or other proceedings, court order, legal process served or pursuant to governmental, intergovernmental and/or other regulatory bodies. Sibilla shall not be liable for misuse or loss of personal information and/or otherwise on the company's website(s) that Sibilla does not have access to or control over. Sibilla will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise.

The Website may contain links to and from the websites of our partner networks/advertisers/etc. If the client follows a link to any of these websites, we do not accept any responsibility or liability for the privacy policies of these websites.

All communication between the Client and the Company will be recorded and retained for reference purposes when and if required by the Company or the regulatory authority that supervises the operations. In cases where personal information may be collected with the use of optional collection methods such as survey questionnaires and special offers for the creation of a demographic profile and/or assessment of Client specific interests, the Company will inform you how the information may be used before the Client decides to participate.

The information provided to us will be kept by the Company for a period of five years after a Client decides to close the account, for regulatory purposes. We will not use this information after closure of the Client's account in any way related to its services, but will only use it as necessary to assist with any law enforcement investigation, to honor any court sanctioned warrant, and for the prevention of any fraudulent action.

## 12. Client's Rights in Relation to Processing Personal Data for Marketing Purposes

The client has the right to ask Sibilla not to process their personal data for marketing purposes. Sibilla will inform the customer before collecting their data if we intend to use Your Data for such purposes or if we intend to disclose the customer's information to any third party for such purposes. The customer can also exercise the right, at any time, to prevent such processing by contacting us via e-mail.

## 13. Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to Sibilla's support team via e-mail on: [compliance@profee.com](mailto:compliance@profee.com)

