

Privacy Policy

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Privacy Policy

This Privacy Policy describes the general principles on how Pure Pay GmbH with registration number HRB 11660 and register office at 5 Passauer Street, 94161, Ruderting, Germany (here and after Pure Operator) process your personal data and is applicable to any person who uses has used or has expressed their intent to use the services of Pure Operator. All of the definitions used in and all circumstances not covered by this Privacy Policy shall be regulated by the terms and conditions of Pure Operator.

The policy concerning the processing of cookies is described in Cookie Policy and is accessible on the Website.

Pure Operator has appointed a data protection officer who can be reached via support@purewallet.app. All of the inquiries and complaints concerning the processing of personal data should be addressed to said email address.

How is personal data collected.

1.1. Pure Operator is to be considered a data controller in respect of personal data collected and processed in respect of providing Services to you.

1.2. In the case of Crypto exchange and Wallet services, Pure Operator is to be considered a data controller in respect of personal data collected and processed in respect of providing services to you in which case Pure Operator is considered either a data processor or a data controller.

1.3. In the case of Debit card, Optimus Cards UK Limited is to be considered a data controller and Pure Operator is considered either a data processor, data controller or a joint controller provided the purpose and means of processing of personal data has been jointly determined by the parties.

1.4. In the context of this Privacy Policy references to we, us, our mean Pure Operator including all of its affiliates.

1.5. Generally personal data is collected directly from you and from the information and documents you have provided. However in order to comply with the legal obligations personal data, eg. identification identity document and financial data are also collected from other sources, eg. from third parties and public sources

Which categories of personal data we are processing

2.1. We are processing the following categories of personal data

2.1.1. identification data, eg. your photo name date and place of birth address

2.1.2. identity document data, eg. Photo of the document number and validity

2.1.3. contact data, eg. phone number email address

2.1.4. financial data, eg. ownership and source of funds and or wealth

2.1.5. transaction data and the nature of using the service eg transaction sums counterparties bank account and card numbers and account holders

2.1.6. other data used for performing customer due diligence measures assessing trustworthiness and to prevent fraud eg media coverage occupation and connection to other persons and device information and location and

2.1.7. correspondence between you and us

For which purposes personal data is processed

3.1. In general we are processing your personal data for the performance of or entering into a contract with you ie personal data is processed for the purposes of providing the services Without processing personal data we would be unable to provide services to you including due to regulatory restrictions

3.2. The purposes for which we are processing personal data are the following

- 3.2.1. fulfilling a contractual obligation eg executing your transaction orders and ensuring the safety of your assets
- 3.2.2. fulfilling a legal obligation eg ensuring the security of accessing the Account and the transactions and using the data for accounting and reporting purposes
- 3.2.3. public interest eg by performing necessary acts in order to prevent money laundering and the financing of terrorism and thus to ensure the proper identity verification
- 3.2.4. sending informative and promotional notifications or collecting processing storing and disclosing personal information eg name and contact information with our partners in order to conduct campaigns and ship the rewards under a revocable consent received from you and
- 3.2.5. our legitimate interest to prevent fraud and to improve our products and services as well as to promote the launch and usage of new functionalities and features and to illustrate the benefits and possibilities of cryptocurrencies and investing eg by identifying concurrently used app versions and by sending promotional content regarding new features and products and to conduct campaigns including in cooperation with third parties and ship the rewards
- 3.3. For entering into and for the performance of the contractual agreement between you and us and for public interests Pure Operator is applying certain automated decision making methods to assess your capability suitability behavior and reputation whether to enter into or to continue a contractual relationship The aforesaid assessment is accompanied by human intervention by an employee of Pure Operator who will perform the final assessment
- 3.4. For entering into and for the performance of a legal obligation Pure Operator is obliged to assess your capability suitability behavior reputation and financial situation whether to enter into or to continue a contractual relationship with you in which case the personal data is processed by Pure Operator as a data processor.

Which persons have access to the personal data

- 4.1. Your personal data is being processed by the following categories of data recipients
 - 4.1.1. our employees responsible for specific tasks regarding the Services
 - 4.1.2. data processors who help us with providing the service's eg service providers for the maintenance of our IT systems and for fulfilling our legal obligations
 - 4.1.3. third parties to whom we are required to transfer data under applicable legislation eg relevant state institutions and sector specific authorities
 - 4.1.4. third parties who help us in developing and promoting the services
- 4.2. Pure Operator has engaged a third party service provider Sum and Substance Ltd a company located and registered in the United Kingdom for obtaining certain information required in relation to the fulfilment of its obligations under anti money laundering and terrorist financing prevention rules. While providing services to Pure Operator, Sum and Substance Ltd processes your personal data as a data processor however for enhancing its machine learning capabilities Substance Ltd is also processing your personal data as a data controller. To acquaint yourself with the relevant data processing activities which Sum and Substance Ltd undertake as a data controller we advise you to read and review the privacy policy located on <https://sumsub.com/>. You should be aware that Pure Operator takes no responsibility in relation to processing activities Substance Ltd undertake as a data controller and you are free to exercise their rights as data subjects in relation to Sum and Substance Ltd fully and independently.
- 4.3. We are not responsible for the actions and processing activities of any third parties Third parties are considered to be separate data controllers whose services can be procured by concluding separate agreements with them Third parties may transfer your personal data to Third Countries and process it for independent purposes
- 4.4. Although generally the personal data is processed within the European Economic Area certain activities may result in the transferring of personal data to Third Countries meaning countries located outside the EUEEA and to countries in relation to which the EU Commission has not issued an adequacy decision eg the US For ensuring that your personal data is protected we have committed to applying appropriate safeguards including but not limited to assessing the security and due diligence measures and regulatory compliance of these persons concluding relevant data processing agreements and standard data protection clauses adopted by the European Commission for the transfers In case you wish to know more about the safeguards and obtain a relevant copy of them please contact us using the details specified above

4.5. We shall maintain the confidentiality of all information of which we become aware on the basis of the relationship with you including information concerning you and the Crypto Account thereof unless the right or obligation to disclose information arises from legislation

4.6. We shall be released from the obligation to maintain confidentiality to the extent that you have granted consent to the disclosure of information in writing or in Pure App or our Website or to the extent a disclosure of confidential information is allowed or required under applicable laws and or mandatory orders by regulatory authorities

How long is personal data stored

5.1. Your personal data is generally retained as long as you are using the Services After you have stopped using the Services and your Crypto Account has been closed your personal data shall be retained as long as any claims can be presented on the basis of such data under applicable legislation

5.2. Certain data eg data obtained for the purposes of the fulfilment of obligations related to anti money laundering and terrorist financing prevention or data necessary for accounting purposes shall be retained as required under applicable legislation and industry standards Generally respectively at least for 5 or 7 years since the date of closing the Account but not longer than 10 years

5.3. We shall immediately terminate processing the data that is processed under your consent if the consent is revoked and the processing of personal data under legitimate interest if you have declared objection to such processing

What are your rights regarding data processing

6.1. You as a data subject are at any time entitled to exercise the following rights

6.1.1. The right to request the correction of your personal data

6.1.2. The right to request access to your personal data

6.1.3. The right to request the erasure of your personal data

6.1.4. The right to withdraw the consent on which the processing is based

6.1.5. The right to request the restriction of processing your personal data

6.1.6. The right to object to the processing of your personal data

6.1.7. The right to exercise data portability in cases where such data has been provided by you for the performance of or entering into a contractual relationship by accepting the Terms or under the consent and



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