

## 1 GENERAL

### 1.1 Our Privacy Policy

UAB Wallter, Lvovo str. 25-140, Vilnius LT-09320, Lithuania, email: [office@Wallter.com](mailto:office@Wallter.com) (“we” “Wallter” or “WLT”) is acting as the data controller with respect to data collected via this website or otherwise obtained and processed by us and is committed to protecting your information and respecting your privacy. Wallter website and client onboarding procedure are both operated together with other Wallter group entities located in UK, Israel and Romania. These entities operate as data processors and act strictly upon WLT instructions.

This Privacy Policy together with the WLT Terms of Use (and any other documents referred to therein) set out the basis on which any personal data we collect from you, or which you provide to us, through our website <https://www.wallter.com> (“Website”) or in connection with your WLT Account (as defined in the WLT Terms of Use) or which is otherwise received by us in connection to our business will be processed by us. When you complete any form, speak with our staff or submit any details to us (including our data processors acting on behalf of us) or using our Website, we will collect, use and disclose your personal information in the manner described in this Privacy Policy.

**PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR VIEWS AND PRACTICES REGARDING YOUR PERSONAL DATA, HOW WE USE IT AND HOW WE WILL TREAT IT. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT USE OUR SERVICES.**

### 1.2 Certification

We agree, if so requested, to notify you of:

- The nature and extent of the personal data we collect from you directly or via 3rd parties;
- Who processes your personal data;
- How your personal data are used;
- With whom we may share your personal data;
- The choices available to you regarding collection, use and distribution of your personal data (i.e. your data subject rights);
- The security procedures in place to protect against the loss, misuse or alteration of personal data processed by us;
- How you can correct any inaccuracies in the personal data we hold.

### 1.3 Changes to this Privacy Policy

Any changes we make to this Privacy Policy in the future will be posted on this page. Any new Privacy Policy will be effective from the time that it is posted on the Website. We reserve the right to make changes to our Privacy Policy at any time, without notice, where such change is required by applicable legislation. If we make any material changes to the way your personal data are used, we

may notify you by email prior to the change becoming effective. You may object to any new use or change in use of your personal data by contacting us as set out in section 10 (Contact Us) below. Depending on the changes, we might treat such objection as a notice to terminate your WLT Account which would be closed in accordance with the WLT Terms of Use.

## 2 SOURCES OF INFORMATION WE COLLECT

### 2.1 Information We Collect from You

We may collect and process the following data about you:

- your full name, address, email address, telephone number, date of birth and bank or payment card details
- and any proof of your identity and/or address that we may request,
- details of any transactions you carry out through our Website using your WLT Account and of the
- fulfillment of your requests,
- details of any bank account (including, but not limited to, account holder, account name, account number, sort code, online banking PIN, Transaction Authentication Number “TAN” and password,
- available balance and transaction history of your bank account,),
- details of any credit, debit or other card used by you for transactions,
- your participation in any promotion sponsored by us,
- correspondence that you send us,
- calls that we make to you or you make to us (call recording),
- surveys that you complete,
- information collected through cookies – please see section 9 Cookies for more details,
- your IP address, log-in times, operating system and browser type,
- details of your visits to our Website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access whilst visiting our Website.

### 2.2 Your Information We Collect from Third Parties

In order to fulfill our legal obligations to prevent fraud and money laundering, we will obtain information about you from third party agencies, including your financial history, county court judgments and bankruptcies, credit reference and fraud prevention agencies when you ask to open a WLT Account and at any time when we feel it is necessary to prevent fraud and minimize our

financial risks or if we need to comply with the regulator's request. Please refer to our Money Laundering Policy for further details.

### **3 HOW WE USE YOUR INFORMATION (data processing purposes and legal basis)**

We use information held about you in the following ways:

- to operate and administer your WLT Account and to provide services that you have requested (legal basis is performance of a contract with you)
- to carry out your instructions to make and receive payments and undertake transactions using our services, including verifying that you have sufficient funds in your nominated bank account to make such payments, (legal basis is performance of a contract with you)
- to allow you to participate in interactive features of the Website, (legal basis is our legitimate interest to provide you with good customer service)
- to notify you about changes to our service(s), (legal basis is our legitimate interest to provide you with good customer service)
- to improve our internal customer training, (legal basis is our legitimate interest to provide you with good customer service)
- to comply with financial services regulations including retention of financial information and transactions, (legal basis is compliance with mandatory statutory provisions)
- for financial and identity checks, fraud prevention checks, anti-money laundering and credit checks, (legal basis is compliance with mandatory statutory provisions)
- for customer service, including answering questions and responding to feedback and complaints, (legal basis is performance of a contract with you)
- to enhance the security of our services, (legal basis is compliance with laws and our legitimate interest to provide security)
- to ensure that content on our Website is presented in the most effective manner for you and for your computer, (legal basis is our legitimate interest to provide you with good customer service) and
- to provide you with information, products or services that you request from us or which we feel may interest you (with respect to existing clients legal basis is our legitimate interest - to provide you with new information about our services. With respect to potential clients our legal basis is your explicit consent).

### **4 STORING YOUR PERSONAL DATA**

#### **4.1 Where Is It Stored?**

The data that we collect from you may be transferred to and stored at destinations outside the European Economic Area ("EEA") for the reasons set out below:

- if this is necessary for providing you with the services you request. For example if you transfer funds to a merchant that is not located in the EEA, it will be necessary to send your details to that merchant,
- where our group companies, some of whom are based outside the EEA, store or process your data in accordance with our internal operational requirements and procedures in order to administer the services you require or in connection with anti-fraud measures,
- where you have consented to receive marketing material from our group companies,
- where our anti-fraud agencies, credit reference agencies and other service providers are based outside the EEA and require access to your data to perform their obligations to us and provide services to you,
- if you have been referred to us by a third party and that third party is entitled to a commission payment – for further detail see section 5.4.

We have taken and will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy policy no matter where it is located.

#### **4.2 Security**

We are committed to ensuring that your information is secure. To prevent unauthorized access or disclosure of information we have physical, electronic and managerial procedures in place to keep your information safe. Once logged into your WLT Account, all internet communication is secured using Secure Socket Layer (SSL) technology with high security 128bit encryption, certified by RapidSSL. However, this high level of protection can only be effective if you follow certain security practices yourself. You must never share your WLT Account or login details with anyone. If you are concerned that any of your login details have been compromised, you can change them any time once you are logged on but you should always also immediately contact Customer Services and tell us why you think your login details have been compromised. Please read our WLT Account Terms of Use for further information on how to keep your WLT Account safe. Details of how to contact Customer Services are available from the “Contact Us” section of the Website. 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 unauthorized access.

#### **4.3 Retention**

We are by law required to retain certain records for a period of at least five years (8 years in some cases) after closure of your WLT Account which will include your personal data such as your name, contact details, customer number and transaction history etc. Otherwise, we will delete and destroy all personal data that we hold about you when you (or we) terminate your WLT Account. We do not store your online banking login PIN, TAN and password. For more specific retention terms, please contact us directly.

## 5 DISCLOSURE OF YOUR INFORMATION

### 5.1 Group Companies

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries who are based in different countries. This may be necessary in order to, among other things, fulfill your request, process your payment details, provide support services and monitor fraudulent activities.

Other Wallter group companies acting as our data processors are located in UK, Israel and Romania. These entities operate as our data processors and act strictly upon WLT instructions. For a comprehensive list of our group entities and their requisites, please contact us using our contact details in section 10 below.

### 5.2 Merchants and other WLT Customers

When sending money to another WLT Account holder or a merchant who you wish to pay we will, at a minimum, pass on your email address to the recipient. Depending on the requirements of the merchant and the type of payment involved, we may also send other personal details such as your name, address and country of residence if the recipients request this information from us in order to improve the payment process, to reconcile payments with the commercial transaction or to conduct their own anti-fraud and anti-money laundering checks.

### 5.3 Fraud and Credit Reference Agencies

When you open a WLT Account, at intervals of up to every 3 months and at any other time we feel it is necessary to do so to protect our financial interests and prevent money-laundering or fraud, we share certain information about you and your WLT Account, financial history and transactions as part of our normal business operations with our banks, payment facilitator partners, credit/debit card processing services, identity verification service providers and credit reference agencies to identify and verify users, to limit our exposure to fraud and other criminal activities and to manage our financial risk. We can provide you with a list of the credit reference agencies we use upon your written request to the email address set out in the Contact Us section below. When conducting identification or fraud prevention checks, the relevant parties may retain a record of our query along with your information and may share this information with other fraud prevention agencies. If you want to know what information these companies hold about you, you can write to them to request access to your information.

Please refer to our Money Laundering Policy for further details.

### 5.4 Other Disclosures

We will share your personal information with third parties only in the ways that are described in this Privacy Policy. We do not sell your personal information to third parties. We may also disclose your personal information to:

- a prospective buyer of our business or a buyer of a substantial number of the shares in our business, if Wallter Payments, Limited is involved in a merger, acquisition, or sale of all or a portion of its assets, you may be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal data, as well as any choices you may have regarding your personal data,
- the police, other lawful enforcement body, regulatory body or court if we are under a duty or required by law to disclose or share your personal data, or to protect the rights, property, or safety of ourselves or our group companies, our customers, or others,
- third parties where you have expressed an interest in receiving information about their goods and services, and
- third parties who referred you to us initially and to whom we owe a commission payment as a result of the referral. Where the commission payment is based on transaction volumes, numbers or types of transactions, we may share that information with that third party, but we will not disclose the full details of each of your transactions without your further written consent.
- third parties we may occasionally use to provide you with the services that you have requested. We require these third parties to not use your personal information for any other purpose.

## 6 COMMUNICATION WITH YOU

We may contact you by email to the primary email address registered with your WLT Account or by telephone to the contact telephone numbers you have provided when registering for your WLT Account. You can change your primary email address and/or contact telephone number at any time, subject to the provisions of section 8 below.

You may also receive system-generated transactional emails such as confirmation of uploads, notification of receipt of payments, notification of password changes etc. which are necessary for the proper operation and administration of your account.

### 6.1 Newsletters and Marketing

As a WLT Account holder, you will occasionally receive information by email from us, unless you have chosen not to receive such communication, and if you have consented to do so from our group companies too, about products, services and special deals which we think will be of interest to you via our newsletter. You can change whether or not you receive newsletters from us and our group companies in the "Profile" section of your WLT Account or in any newsletter email by clicking on the appropriate 'opt-out' link. Please note that you will still receive communication regarding your WLT Account such as transactional emails or other notification affecting the operation of your WLT Account or our legal relationship. From time to time we do share aggregated information about our customers' use of our website and services with other companies for research and analysis purposes, but you cannot be identified from this aggregated information.

## 6.2 Phishing

Phishing is the name given to attempts to steal personal details and financial account details from a website user.

“Phishers” use fake or “spoof” emails to lead users to counterfeit websites where the user is tricked into entering their personal details, such as credit card numbers, user names and passwords. WE WILL NEVER SEND EMAILS ASKING YOU FOR SUCH DETAILS AND OUR STAFF WILL NEVER ASK YOU FOR YOUR PASSWORD.

If you do receive such an email or are asked for your password by anyone claiming to work for us please forward the email or report the incident by email to our Data Protection Officer (contact details are at the end of this policy) or by contacting Customer Services.

## 7 LINKS TO OTHER WEBSITES

Our Website 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. Our Web site may also include Social Media Features, such as the Facebook Like button and Widgets, such as the Share button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it. For the purposes of collecting your data via such third party plug-ins, “Like” button and Widgets we and the relevant third party act as joint data controllers. However, we do not control how third parties process your data further, please refer to their privacy policies.

## 8 ACCESSING AND UPDATING YOUR INFORMATION

If your personal details (such as your name, address, or telephone number) change, you should update and can also delete your details in the “Profile” section of your WLT Account or by contacting Customer Services via the “Contact Us” section of the Website as soon as you can. We shall not be liable for any loss arising out of your failure to keep your personal details up to date. Your address and phone number can only be changed once in any 3 month period. In order to deactivate your WLT Account, please refer to the WLT Terms of Use. You have the right to access information that we hold about you. To do so, please contact us at the address given at the end of this policy. Access may be subject to a fee of up to £10.

## 9 COOKIES

### 9.1 General

A cookie is a small amount of data which contains information that is downloaded to the device from which you access our site. Cookies are useful because they allow us and other websites to recognize your device. For more comprehensive information about how cookies work, see <http://www.allaboutcookies.org>.

Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. For example, they can allow you to navigate between web pages of our site and remember your preferences such as your language selection.

## 9.2 Types of Cookies and Consent

In order to comply with legislation, we have reviewed the use of cookies on our site and set out the information below. This is to ensure that you are aware of these cookies and are able to give your consent for the placing of some or all of these cookies on your device when you use our site. In summary, we use the following types of cookies:

- **Strictly necessary cookies** – These are cookies which are essential for our site to operate such as those which identify you so you can log into your WLT Account. They allow you to move around our website and use the services you have requested. These cookies will be activated when you enter our site and as you use our site.

Further details of the cookies we use and how they relate to the descriptions set out above can be found in Annex A to this policy. We may use other cookies from time to time in accordance with this policy. You can manage your cookies by adjusting your browser settings or by using our cookie pop-up tool. Please see section 9.3 below.

## 9.3 Blocking Cookies

Should you want to continue using our services but restrict our use of cookies, you can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including Strictly necessary as set described above) you may not be able to access all or parts of our site. Our site may issue some of the cookies described above as soon as you visit our site unless you have adjusted your browser setting so that it will refuse cookies.

## 10 YOUR RIGHTS AS A DATA SUBJECT

We have a legal obligation to ensure that your personal data is kept accurate and up to date. We kindly ask you to assist us to comply with this obligation by ensuring that you inform us of any changes that have to be made to any of your personal data that we are processing.

You may, at any time, exercise the following rights with respect to our processing of your personal data by contacting us via contact information referred to in this Privacy policy:

**Right to access:** you have the right to request access to any data that can be considered your personal data. This includes the right to be informed on whether we process your personal data, what personal data categories are being processed by us, and the purpose of our data processing;

**Right to rectification:** you have the right to request that we correct any of your personal data if you believe that it is inaccurate or incomplete;

**Right to object:** you are entitled to object to certain processing of personal data, including for example, making automated decisions based on your personal data or when we otherwise base the processing of your personal data on our legitimate interest;

**Right to restrict personal data processing:** you have the right to request that we restrict the processing of your personal data if you wish to: (i) object the lawfulness of the processing; (ii) fix unlawful processing of personal data; (iii) receive or avoid deletion of personal data for establishing or defending against legal claims; or (iv) demand restriction of the processing until assessing the plausibility of Wallter's legitimate interest in the specific processing activity;

**Right to erasure:** you may also request your personal data to be erased if the personal data is no longer necessary for the purposes for which it was collected, or if you consider that the processing is unlawful, or if you consider that the personal data has to be erased to enable us to comply with a legal requirement;

**Right to data portability:** if your personal data is being automatically processed with your consent or on the basis of a mutual contractual relationship, you may request that we provide you that personal data in a structured, commonly used and machine-readable format. Moreover, you may request that the personal data is transmitted to another controller. Bear in mind that the latter can only be done if that is technically feasible;

**Right to withdraw your consent:** in cases where the processing is based on your consent, you have the right to withdraw your consent to such processing at any time without any adverse effect;

**Right to submit your claim with the supervisory authority:** if you are not satisfied with our response to your request in relation to personal data or you believe we are processing your personal data not in accordance with the law, you can submit your claim with the supervisory authority in your country of residence or to the lead supervisory authority – the Lithuanian State Data Protection Inspectorate at [www.ada.lt](http://www.ada.lt).

Please note that you will need to provide sufficient information for us to handle your request regarding your rights. Prior to answering your request, we may ask you to provide additional information for the purposes of authenticating you and evaluating your request.

## 11 CONTACT US

If you have any questions about our Privacy Policy or your information, please contact us in writing by email at [info@wallter.com](mailto:info@wallter.com) or by post to:

- Wallter Payments, Ltd., Attention Chief Compliance Officer, Suite 5 Arkleigh Mansions Brent Street London NW4 1BJ OR
- UAB Wallter, Lvovo str. 25-140, Vilnius LT-09320, Lithuania.

ANNEX A  
LIST OF COOKIES USED BY US

Strictly Necessary Cookies			
Name	Provider	Purpose	Expiry
PHPSESSID	acc-tst.wallter.com	Session information for our application	7 days or upon logout
XSRF-TOKEN	acc-tst.wallter.com	This cookie is written to help with site security in preventing Cross-Site Request Forgery attacks.	Real time cookie, expires immediately
__cfduid	.wallter.com	Used by CloudeFlare to speed up page load times.It is used to override any security restrictions based on the IP address the visitor is coming from. It does not contain any user identification information.	1 month or upon logout
wallter_session	acc-tst.wallter.com	Security access token	Session