

# **PATCHPAY...safeguarding your transactions.**

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of Your information when You use our Service and tells You about Your privacy rights and how the law protects You.

You accept this Privacy Policy and hereby give us consent to save, process and use Your Personal Data to the extent as allowed by law when You provide us with details of Your Personal Data or by clicking on the “accept” button.

We may change this Privacy Policy from time to time. If we make changes, we will notify You by revising the date at the top of this policy, and in some cases, we may provide You with additional notice (such as by adding a statement to the homepages of our website or [mobile application] or by sending You an email notification).

We encourage You to review the Privacy Policy whenever You interact with us to stay informed about our information practices and the ways You can help protect Your privacy.

## **The types of personal information we collect and hold**

We collect personal information about our users in order to provide our products, services, and customer support. Not all information requested, collected, and processed by us is “Personal Information” as it does not identify you as a specific natural person. This will include the majority of “User Generated Content” that you provide us with the intention of sharing with other users inside a transaction. Such “Non-Personal Information” is not covered by this privacy policy. However, as non-personal information may be used in aggregate or be linked with existing personal information; when in this form it will be treated as personal information. As such, this privacy policy will list both types of information for the sake of transparency.

In some situations users may provide us with personal information without us asking for it, or through means not intended for the collection of particular types of information. Whilst we may take reasonable steps to protect this data, the user will have bypassed our systems, processes, and control and thus the information provided will not be governed by this privacy policy.

In some situations users may provide us personal information over platforms that are outside our control; for example through social media or forums. Whilst any information collected by us is governed by this Privacy Policy, the platform by which it was communicated will be governed by its own Privacy Policy.

## **How we collect personal information**

### **Information that you specifically give us**

While you use our products and services you may be asked to provide certain types of personal information. This might happen through our website, applications, online chat systems, telephone, paper forms, or in-person meetings. We will give you a Collection Notice at the time, to explain how we will use the personal information we are asking for. The notice may be written or verbal.

We may request, collect, or process the following information:

- Account Details - password
- Contact Details - email address, phone number
- Location Details - physical address, billing address, timezone
- Identity Details - full name, proof of identity (e.g. drivers license, passport), proof of address (e.g. utility bill)
- Financial Information - credit card details, payment processor details.
- User Generated Content - transaction descriptions, transaction attachments

## **How we use personal information**

The information we request, collect, and process is primarily used to provide users with the product or service they have requested. More specifically, we may use your personal information for the following purposes:

- to provide the service or product you have requested;
- to facilitate the creation of PatchPay Agreements;
- to provide technical or other support to you;
- to answer enquiries about our services, or to respond to a complaint;
- to promote our other programs, products or services which may be of interest to you (unless you have opted out from such communications);
- to allow for debugging, testing and otherwise operate our platforms;
- to conduct data analysis, research and otherwise build and improve our platforms;
- to comply with legal and regulatory obligations;
- if otherwise permitted or required by law; or
- for other purposes with your consent, unless you withdraw your consent for these purposes.

The 'lawful processing' grounds on which we will use personal information about our users are (but are not limited to):

- when a user has given consent;
- when necessary for the performance of a contract to which the user is party;
- processing is necessary for compliance with our legal obligations;
- processing is necessary in order to protect the vital interests of our users or of another natural person;
- processing is done in pursuing our legitimate interests, where these interests do not infringe on the rights of our users.

## **When we disclose personal information**

### **Our third-party service providers**

The personal information of users may be held or processed on our behalf by our third party service providers. Our third party service providers are bound by contract to only use your personal information on our behalf, under our instructions. Our third party service providers include:

- Cloud hosting, storage, networking and related providers
- SMS providers
- Payment and Banking providers
- Marketing and analytics providers
- Security providers
- Chat providers
- Email providers

### **Other disclosures and transfers**

We may also disclose your personal information to third parties for the following purposes:

- if necessary to provide the service or product you have requested;
- We receive court orders, subpoenas or other requests for information by law enforcement,
- if otherwise permitted or required by law; or
- for other purposes with your consent.