

## Privacy Policy

### 1. INTRODUCTION

This website [smartsaver.monefit.com] (the "**Site**") is operated by Monefit Card OÜ. Monefit Card OÜ is part of the international fintech consolidation group Creditstar Group.

Monefit Card OÜ (hereinafter "**Monefit**", "**us**", "**we**" or "**our**") respects your privacy and is committed to protecting your personal data ("**Data**"). This Privacy Policy will inform you as to how we look after your personal data when you visit the **Site** (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### 2. APPLICATION OF PRIVACY POLICY

This Privacy Policy together with the [Cookie Policy](#) sets out the **Data** that **we** collect, use and otherwise process in connection with your use of the **Site**. The **Data we** process will depend on how you use our **Site**. The **Site** is not intended for children and **we** do not knowingly collect information relating to children.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice **we** may provide on specific occasions when **we** are collecting or processing personal **data** about you so that you are fully aware of how and why **we** are using your Data. This Privacy Policy supplements the other notices and is not intended to override them.

**We** will use your **Data** only for the purposes and in the manner set forth below, which describes the steps **we** take to ensure the processing of your **Data** is in compliance with the European Union Law including Regulation (EU) 2016/679, known as the General Data Protection Regulation or GDPR, and any other applicable legislation, including Data Protection Act 2018, the Swiss Federal Act on Data Protection

(FADP) and any subsequent **data** protection and privacy legislation and any subsequent amendments thereto (collectively referred to as "Data Protection Legislation").

### **3. IDENTITY OF THE CONTROLLER OF THE DATA**

For the purposes of the **Data** Protection Legislation, the **Data** Controller of the **Site** is Monefit Card OÜ, having its registered office a Kai tn 4, 10111, Tallinn, Estonia. Kai tn 4, 10111, Tallinn, Estonia.

### **4. CONTACT DETAILS OF THE DATA PROTECTION OFFICER**

**We** have appointed a **Data** Protection Officer ("DPO") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, please contact the DPO using the details set out below.

The contact details of **our** DPO are as follows:

**Christian Isaksen**

**Email address: [dpo@monefit.com](mailto:dpo@monefit.com)**

### **5. WHAT DATA DO WE COLLECT ABOUT YOU**

**We** collect your **Data** from a number of sources.

The **Data we** collect about you may include the following:

- **Personal information for individuals: first name, last name, country, country of tax residence, national identity number, birthdate, contact details, bank details;**
- **Information about investing entities: [name, country, registration number, legal address, tax residency, bank details]; information about representative: [first name, last name, national identity number, country of tax residence, birthdate, contact details]; details of beneficial owners owning more than 25% of the shares of the legal entity.**
- **Transactional information: records of payments made to and received from and in connection to the services provided by Monefit, records of invested funds, investments, net annual return, available funds;**
- **Information provided voluntarily by filling in forms on our Site, by registering an account, by contacting us through "contact us" section on our Site (which may from time to time include requesting information from us or submitting comments) and/or when you meet with us.**

**We** do not collect any Special Categories of Personal **Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do **we** collect any information about criminal convictions and offenses.

## **6. WHY DO WE COLLECT YOUR DATA**

**We** collect and process information about you for the purposes of complying with **our** legal duties and for other legitimate purposes. **We** may use your Data, collected from direct interaction, automated forms and third parties to:

- **Ensure that content from our Site is presented in the most effective, responsive and compatible manner for you and for your computer or device;**
- **Respond to your requests for information and other communication or correspondence you may submit to us;**
- **Provide you with general information on our Site and to provide you with personalised services;**
- **Provide marketing information and special offers with your consent;**
- **Enable you to login to the Site and our web platform, using your email address, username and the password that you have chosen;**
- **Provide you with information about your registration or accounts;**
- **Provide you with the information or services that you request from us;**
- **Carry out statistical analysis, customer surveys and market research;**
- **Allow you to participate in interactive features of our Site, when you choose to do so;**

- **Carry out activities necessary to the running of Monefit, including systems testing, network monitoring, staff training, improving technical systems and IT infrastructure, and quality control;**
- **Notify you about changes to our Site, services or policies;**
- **Legal obligations and identity checks in order to comply with the applicable laws and international agreements;**
- **In order to conclude and execute a contract with the Client; ensuring the accuracy of the data by checking and updating internal and external data sources and to be able to fulfil the obligations of the contract between the User and Monefit;**
- **For the interests of the client and/or Monefit; and to know the quality of the services provided; and to provide evidence of commercial transactions and other commercial communication;**
- **To prevent the abuse of dishonest use of services and to provide proper provision of services. To sanction and control the access to digital channels, to prevent unauthorised access and to ensure information security.**

## **7. BASIS OF PROCESSING**

For some processing activities, **we** consider that more than one lawful basis may be relevant – depending on the circumstances.

The following are the basis for the processing of your personal data:

- **It is necessary for the purposes of our contract with you or to take steps for entering into our contract with you;**
- **It is necessary to comply with our legal obligations;**
- **Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and**
- **Consent, where the personal data relates to the person supplying it to Monefit and has been supplied to Monefit voluntarily.**

## **8. DISCLOSURE OF YOUR DATA**

**We** consider your **Data** to be private and confidential.

From time to time, **we** may collect and share your **Data** with third parties, including third party service providers or other entities within **our** group (i.e. the Creditstar Group). We may access and/or disclose your **Data** if required to do so by law or in good faith and belief that such action is necessary to: (a) conform with the law or comply with legal process served on **us**; (b) protect and defend **our** rights or property including, without limitation the security and integrity of **our** network and systems; or (c) act under exigent circumstances to protect the personal safety of users of **our** services or members of the public.

### **Service Providers:**

**We** use third party service providers who work for **us** in the provision of **our** services, for example, communications, marketing, IT service providers, verification agencies and other business support companies. In providing the services, your **Data** will, where applicable, be processed by the service provider on **our** behalf.

**We** will check any third party that **we** use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your Data. **We** will have written contracts with them which provide assurances regarding the protections that they will give to your **Data** and their compliance with **our data** security standards and international transfer restrictions.

### **Disclosure to Third Parties:**

In certain circumstances, **we** may share and/or are obliged to share your **Data** with third parties for the purposes described above and in accordance with **Data** Protection Legislation.

These organisations will also use your **Data** as a "Data Controller" – they will have their own privacy notices which you should read, and they have their own responsibilities to comply with applicable **Data** Protection Legislation.

## 9. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

Your **Data** may be transferred, stored and processed in one or more countries outside the European Economic Area (“**EEA**”), for example, when one of **our** service providers use employees or equipment based outside the EEA. For transfers of your personal **data** to third parties outside of the EEA, **we** take additional steps in line with **Data** Protection Legislation. **We** have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights, e.g. **we** establish an adequate level of **data** protection through EU Standard Contractual Clauses based on the EU commission’s model clauses.

If you would like to see a copy of any relevant provisions, please contact the DPO (see “Contact Details of the Data Protection Officer” section above).

## 10. HOW LONG WILL WE USE YOUR DATA FOR?

**We** keep your personal **data** for as long as it is necessary to do so to fulfil the purposes for which it was collected as described above, including for the purposes of satisfying any legal, accounting, or reporting requirements. This may mean that some information is held for longer than other information, for example, **we** may need to retain some **Data** for up to ten years. The criteria **we** use to determine data retention periods for personal **Data** includes the following:

- **Local laws;**
- **Business obligations;**
- **Claims.**

To determine the appropriate retention period for personal data, **we** consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which **we** process your personal **data** and whether **we** can achieve those purposes through other means, and the applicable legal requirements.

## 11. LINKS TO OTHER WEBSITES

The **Site** contains links to and from other websites and web platforms. In addition, third parties websites may also provide links to the **Site**. If you follow a link to any of those websites or web platforms, please note that those websites and web platforms have their own privacy policies and that **we** do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal **data** to those websites.

**We** do not accept, and **we** disclaim, any responsibility for the privacy policies and information protection practices of any third party website (whether or not such website is linked on or to the **Site**). These links are provided to you for convenience purposes only, and you access them at your own risk. It is your responsibility to check the third party website's Privacy Policy before you submit any personal **data** to their websites.

## 12. SECURITY

**We** will use appropriate technical and physical security measures to protect your personal **data** which is transmitted, stored or otherwise processed by **us**, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access.

Access is only granted to **Data** on a need-to-know basis to those people whose roles require them to process your personal data. In addition, **our** service providers are also selected carefully and required to use appropriate protective measures.

As effective as modern security practices are, no physical or electronic security system is entirely secure. The transmission of information via the internet is not completely secure. Although **we** will do **our** best to protect your Data, **we** cannot guarantee the security of your **Data** transmitted to the **Site**. Any transmission of **Data** is at your own risk. Once **we** receive your Data, **we** will use appropriate security measures to seek to prevent unauthorised access. **We** will continue to revise policies and implement additional security features as new technologies become available.

### **13. YOUR RIGHTS**

You may have various rights under **Data** Protection Legislation. However, in certain circumstances, these rights may be restricted. In particular, your rights may be restricted where this is necessary: (i) for the prevention, detection, investigation and prosecution of criminal offences, and/or (ii) in contemplation of or for the establishment, exercise or defence of a legal claim or legal proceedings (whether before a court, tribunal, statutory body or an administrative or out-of-court procedure).

Subject to the above, your rights under **Data** Protection Legislation may include (as relevant) the right to:

- **Request access to your data (commonly known as a "data subject access request"). this enables you to receive information about the data we hold about you.**
- **Request correction of the data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.**
- **Request erasure of your data. this enables you to ask us to delete or remove data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (in certain circumstances).**
- **Object to processing of your data where we are relying on a legitimate interest for processing (or a legitimate interest of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes.**
- **Request the restriction of processing of your data. This enables you to ask us to suspend the processing of data about you, for example if you want us to establish its accuracy or the reason for processing it.**
- **Request the transfer of your data to another party.**

If you want to review, verify, correct or request erasure of your Data, object to its Processing, or request that **we** transfer a copy of your **Data** to another party, please contact the DPO (see "**Contact Details of the Data Protection Officer**" section above).

### **14. COMPLAINTS**



If you are unhappy about any aspect of the way **we** collect, share or use your Data, please let us know by contacting **our** DPO:

**Email address of DPO:** [dpo@monefit.com](mailto:dpo@monefit.com)

You also have a right to complain to the **Data** Protection Inspectorate ([www.aki.ee](http://www.aki.ee)).

## **15. CHANGES TO OUR PRIVACY POLICY**

**We** reserve the right to change this Privacy Policy at any time in **our** sole discretion. If **we** make changes to this Privacy Policy they will be posted on the **Site** so that you are always aware of what information **we** gather, how **we** might use that information and in what circumstances **we** may disclose it. By continuing to use **our Site** after **we** post any such changes, you accept and agree to this Privacy Policy as modified.