

Privacy Policy

This Privacy Policy sets out how PayAlly Limited (hereinafter “PayAlly”) uses and protects any information that you give PayAlly when you use this website. Please read carefully through this policy to understand our views and practices regarding your personal information and how we will treat it.

Who we are

PayAlly is a private company limited by shares, registered in England and Wales under number 10600055, whose registered office is at 80 Coleman Street, London, United Kingdom, EC2R 5BJ (hereinafter also referred to as “we,” “our,” or “us”) is committed to ensuring that your privacy is protected. We are authorised by the Financial Conduct Authority of United Kingdom, under license No. 774327, to provide certain payment services under The Payment Services Regulations 2017. PayAlly is registered with the Information Commissioner’s Office under registration reference ZA265458. If you have any complaints about personal information handling by PayAlly please contact us at data.protection@payally.co.uk or you may choose to file a complaint with the Information Commissioner’s Office by calling [+44 303 123 1113](tel:+443031231113) or filing a report over internet <https://ico.org.uk/concerns/>.

PayAlly may change this policy from time to time by updating this page. The revised Privacy Policy will be effective as of the publishing date. When it will be necessary, we will notify you regarding such update, in all other instances you are responsible for checking this policy from time to time. It is always advisable to visit this page as to check whether there were any updates with regard to our processing practices.

What this policy means to you

By using our services set out in our Terms and Conditions , you recognise that you have familiarised with the terms of this Privacy Policy. By visiting the webpage or using the app you recognise that PayAlly may record, store, process and transfer (hereinafter “process”) personal information in accordance with company’s Privacy Policy. Such information and records are governed and protected by the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (hereinafter “UK GDPR”). Generally, PayAlly is processing information on the basis of contractual performance in accordance with this Privacy Policy. In some other instances, we process the information as to enter into contractual relationship or to conform to our legitimate interests.

More precisely, here are outlined causes, types, bases and interests to which we adhere while we are processing information:

What we use information for	Types of information	Our basis	Our legitimate interests
<i>To provide our services:</i>			
To carry out our obligations arising from any transactions you carry out, including but not limited to: Top Ups, Instant Transfers, Bank Transfers, ATM Withdrawals and Card Purchases;	Personally identifiable information	Fulfilment of contracts	Pursuing pre-agreed activities
To provide you with the information, products and services that you request from us;	Technical information	Our legitimate interests	Business pursuits of providing with highest quality services
To provide support for smooth operation of our services.	Information about your visit	Our legal obligations	Complying with legislation and regulations
<i>To prevent illegal activities:</i>			
To perform customer identification and obtain knowledge about you, as to prevent financial crimes from occurring and to confirm your eligibility to use our products and services;	Transaction information	Fulfilment of contracts	Complying with legislation and regulations
To help us better understand your financial status, expectations and behaviour so that we may manage in the best manner your account and provide highest quality services while simultaneously identifying suspicious activities.	Personally identifiable information	Fulfilment of contracts	Developing and improving how we deal with financial crime
	Technical information	Our legitimate interests	Complying with legislation and regulations
	Information about your visit	Our legal obligation	
	Transaction information		
<i>To help market and provide new relevant products and services:</i>			
To provide you with information about other goods and services which are similar to those that you have already purchased or revealed interest in;	Personally identifiable information		Developing products and services for existing customers and any applicable fees in relation to them
To analyse the effectiveness of advertising and to deliver relevant information to you;	Technical information	Our legitimate interests	Defining types of customers for new products or services
To provide you, with information about goods or services we believe may interest you.	Information about your visit		Being efficient about how we fulfil our legal and contractual duties

What we use information for	Types of information	Our basis	Our legitimate interests
<i>To maintain and improve provision of services:</i>			
To maintain and improve our website and the app for internal operations, including but not limited to troubleshooting, data analysis, testing, research;	Personally identifiable information	Fulfilment of contracts	Being robust about how we fulfil our obligations
	Technical information	Our legitimate interests	
To ensure and amend the content from our site as to present it in the best possible manner;	Information about your visit	Our legal obligations	Complying with legislation and regulations
		Transaction information	
<i>To provide location-based services:</i>			
To deliver relevant promotions, for example, information on services available in the region;	Personally identifiable information	Fulfilment of contracts	Developing new products and services
	Technical information	Our legitimate interests	Being efficient about how we fulfil our legal and contractual duties
To protect against fraud and prevent illegal activities.	Information about your visit	Our legal obligations	Complying with legislation and regulations
		Transaction information	

What information you provide

PayAlly will gather personally identifiable information only at your own request or if there is a legitimate reason for us to do so. You may give us information about you by filling in customer application forms on our website www.payally.co.uk (hereinafter also referred as “website”) or by communicating with us by mail, phone, e-mail, SMS or other means in order to enter into a contract with you and carry out our obligations arising from any contracts entered into between you and us. This includes information you provide when you register to use our website, apply for our services, open an account, search for a product or service, place an order on our site, enter a promotion or a survey, and when you report a problem with our website. The information you give us may include but is not limited to your name, address, e-mail address and phone number, financial and credit card information, government issued identification documents, other personal information, that you need to provide in order to register and use PayAlly’s services.

What information we collect

During each of your visits to our website we may automatically collect the following information:

- Personally identifiable information - this includes information gathered when you register to use our website, apply for our services, open an account, search for a product or service, place an order on our site, enter a promotion or a survey, and when you report a problem with our website. The information you give us may include but is not limited to your name; address; e-mail address and phone number; financial and credit card information; government-issued identification documents; other personal information, that you need to provide in order to register and use our services.
- Technical information - including the Internet Protocol (IP) address used to connect your computer to the Internet, unique device identifier, location, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit - including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); referrer URL; products and services you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page; and any phone number used to call our customer service number;
- Transaction information - including date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the merchant or ATMs associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment and the payment instrument used.

Information we receive from third parties

We work closely with various third parties including, for example, business partners, sub-contractors in information technology, other payment services providers, search engines, advertising agencies, analytics providers, credit reference agencies, fraud prevention agencies and may receive information about you from them in order to enter into a contract with you and carry out our obligations arising from any contracts entered into between you and us.

The use of credit reference agencies and fraud prevention agencies is not limited to such agencies based in the United Kingdom and includes such agencies overseas. You are entitled to access your personal records held by credit and fraud prevention agencies.

Information we process when you sign up to become a merchant

If you sign up to become one of our merchants, we will collect information we need to enter into and perform a contract with you. Such information includes your contact information,

address, order details, product details, tax information, payment details and other reasonably necessary information. We use this information to set up our products and services for you, including to provide you with support, boarding, integration, installation, helping you with settings, gateway installation, and other actions which need to be taken to enter into or perform our contract with you. In addition, we use your information for our legitimate interest of managing our internal administration and for complying with our legal obligations.

We also process data about your use of our products and services, and all information which we receive in connection to our business relationship. Such data includes but is not limited to queries, communications, comments we receive from you. We process this data to be able to perform our contract by resolving the issues and providing you with support and for furthering our legitimate interest of being able to develop and improve our products, services and support.

We can also use your supplied e-mail address to inform you on our products and services and to offer you similar products and services as those that you have already purchased from us.

We have an obligation to provide our services only in compliance with national and international legislation, regulations and sanction lists and to prevent laundering proceeds of crime and prevent terrorism financing. As we are authorised to provide financial services, we are not allowed to accept any merchant without performing customer due diligence and we have to determine and report when suspicious transactions take place. Therefore, if you are applying to become one of our merchants, we will often need to collect information and documents to:

- verify your identity;
- identify the ultimate beneficial owners of your business;
- identify the purpose and intended nature of your future business relationship with us;
- monitor your transactions and verify the origins of your capital/assets;
- verify compliance with the rules of card networks;
- verify identity and check whether a natural person representing you is competent to do so;
- check whether you act on behalf of yourself or on behalf of a third party.

We process copies of your identification documents, the address of your legal representative and shareholders, your bank account number, your contact information, information contained in correspondence between us, bank statements, your signature and an extract from company register. We use this data to ensure the safety and integrity of the financial sector by aiming to identify, prevent and counter illegal conduct and to comply with our legal know-your-customer, counter terrorism financing, and anti-money laundering obligations.

What we do with the information we gather

We require this information to understand your needs, enter into a contract between us and you, and provide you with a better service and follow our legitimate interests, and in particular for the following reasons:

- To perform customer identification as to confirm your eligibility to use our services;
- To enter into contractual relationship and further provision of our services to you;
- Internal record keeping;
- To carry out our obligations arising from any transactions you carry out;
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To notify you about any changes to our products, services, terms and conditions or other important matters related to your use of our services;
- Internal record keeping;
- To verify your identity to protect against fraud, comply with financial criminal laws and to confirm your eligibility to use our products and services;
- To ensure that content from our site is presented in the most suitable manner for you and for your device.

Legitimate interests mean our interest as a business in conducting and managing services and be able to provide you with the most secure and highest quality services. Whenever, we rely on legitimate interest we make sure balance impact on you and your rights. We have following legitimate interests whilst processing your data:

- Business pursuits of providing highest quality services;
- Developing and improving how we deal with financial crime;
- Developing products and services, enhancing existing products and services, and adjusting any applicable fees in relation to them;
- Being efficient about how we fulfil our legal and contractual duties;
- To manage risk and protect the website, the services and you from fraud;
- We may periodically contact you via electronic means about new products, special offers or other information which we think you may find interesting using contact information which you have provided;
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, SMS or mail. We may use the information to customise the website according to your interests.

Disclosure of your information

In some circumstances we may disclose information which we gathered from you to certain third parties. First and foremost, it concerns our business partners to whom we must submit information in order to render services which you requested. We are obliged under fraud prevention, anti-money laundering and counter terrorist financing legislation to monitor suspicious activities and implement policies which are compliant with certain laws to which we are subject. Hence, we must retain certain information which we further may transfer to supervisory authorities. We may use supplied information in order to enforce or apply the General Terms and Conditions and/or any other agreements between you and us or to investigate potential breaches.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. All information you provide us is stored on our secure servers within European Economic Area. All html customer application forms and any payment transactions are encrypted using SSL technology. You are responsible for keeping website login and passwords credentials, OTP/MAC token generator confidential and not to share with anybody.

You have to be aware that the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website; any transmission is at your own risk only. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

International transfers of personal information

We are based and provide services only in the United Kingdom but our service providers may store, transfer, and otherwise process your personal information in countries outside of the country of your residence, and possibly other countries which are within the UK, the EEA or countries which are granted recognition of adequacy by the European Commission. We use approved Model Contractual Clauses for the international transfer of personal information collected in the UK, the European Economic Area and Switzerland.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us to analyse information about web page traffic and improve our website in order to tailor it to our customer needs. We only use this information for statistical analysis purposes and then the information is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the information you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

To learn more about how we use cookies please visit our [Cookie Policy](#).

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you want the information to be used by anybody for direct marketing purposes. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at unsubscribe@payally.co.uk or in a same manner as you subscribed by clicking on a box on our webpage.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen. We do not disclose information about identifiable individuals to our advertisers.

You may request details of personal information which we hold about you. A small fee will be payable if request will be excessive or manifestly unfounded (for example, where you make repetitive requests to supply you with the information). If you would like a copy of the information held on you, please send us secure message via our client portal, or if you are no longer a client, please write to PayAlly Limited, 80 Coleman Street, London, United Kingdom, EC2R 5BJ or email us at data.protection@payally.co.uk. Note that while requesting us to supply you with information we will need to identify your personality.

You may request us to correct or delete any information which you believe is incorrect or incomplete. In such case please send us secure message via our client portal, or if you are no longer a client, please write to PayAlly Limited, 80 Coleman Street, London, United Kingdom, EC2R 5BJ or email us at data.protection@payally.co.uk. Note that while requesting us to to correct or delete any information we will need to identify your personality. We will promptly correct any information found to be wrong. However, if you will request us to delete the information which we must maintain in order to follow our legal obligations such as fraud prevention, anti money laundering or counter terrorism financing we will need to decline your request and keep that information for five (5) years after last settled transaction or from the end date of our relationship, whichever occurs last.

At all time during our collaboration you have a right to withdraw your consent and hence not supply us with your information, stop using our services and stop our collection from the third parties. In such case, we will stop processing of your information when all outstanding

orders will be settled. If you wish to withdraw your consent you may change it in your settings, send us secure message via our client portal, or if you are no longer a client, please write to PayAlly Limited, 80 Coleman Street, London, United Kingdom, EC2R 5BJ or email us at data.protection@payally.co.uk However, if you withdraw your consent, we will still retain information, which we must maintain in order to follow our legal obligations such as fraud prevention, anti money laundering or counter terrorism financing and we will keep that information for five (5) years after last settled transaction or from the end date of our relationship, whichever occurs last.

You can object any of our action or inaction in relation to handling of your personal information by writing to PayAlly Limited, 80 Coleman Street, London, United Kingdom, EC2R 5BJ or emailing us at data.protection@payally.co.uk. You may choose to file a complaint with the Information Commissioner's Office by calling [+44 303 123 1113](tel:+443031231113) or filing a report over internet <https://ico.org.uk/concerns/>. If you are residing in another country you may contact your competent national authority responsible for the protection of information.

Period during which we will store your information

We will store information which you supplied for the whole time of our cooperation with you depending on the terms as enshrined in the documents which outline our relationships such as General Terms and Conditions and/or any other agreements between you and us. Additionally, we will store your information for the period of five (5) years after the date of settlement of last transaction or termination of contractual relationship whichever occurs last. We do so in order to carry out our obligations under the fraud prevention, anti-money laundering and counter terrorism financing legislation. During this period, we do not process your information, unless we are requested to do so by the competent authorities.

Children's personal information

We do not knowingly request to collect personal information from any person under the age of 18. If a user submitting personal information is suspected of being younger than 18 years of age, PayAlly will not allow the user to apply or use our services. Please notify us if you know of any individuals under the age of 18 using our services so we can take action to prevent access to our services.