

GDPR

GENERAL DATA PROTECTION REGULATION POLICY



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Introduction

This policy lays out the basis on which, during the business relationship, any personal data we receive from you or that you send to us. To clarify our opinions and policies concerning your personal data and how we will treat it, please read the following carefully.

What Kind of Data We Collect from You?

By filling in the forms on our website or by contacting us by phone, e-mail or otherwise, you can give us information about you. This includes but is not limited to) data that you provide when you register with us, transfer money through our office or websites, and when you report a problem with us.

The data you give us may include:

- Name, address, job title and email address
- Date of birth
- Phone number
- Address proof
- Financial and Source of Fund information
- Payment reason
- Geographic location
- Copies of identification

What We Do with The Information We Gather from You?

The main reason we use this data is to provide you with details about our products and services, but we (or third-party data processors, agents and sub-contractors acting on our behalf) may also use the information:

- To communicate with you
- To assess the risk of performing our services
- To help us perform our services
- To enable us to enforce our rights under our terms and conditions if necessary
- To administer our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our products and services
- As part of our efforts to keep our Sites safe and secure;
- For promotional purposes including, without limitation, to share the personal data with businesses in our group and with selected third parties whom we believe have products or services that may be of interest to you
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- From time to time, we may also use your information to contact you for market research purposes

We may combine information we receive from other sources with information you give to us and information we collect about you.

We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).



A Special Note About Children

We ask that persons under the age of 18 (which we treat as children and minors) refrain from using our Service or submitting any personal information to us. Persons under the age of 18 years are not eligible to use our Service and if we discover that someone under the age of 18 has registered a Profile with us, we will close it.

Where We Store Your Personal Data?

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be **encrypted** using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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.

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 Website; 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 unauthorised access.

How Long is Your Personal Information Retained?

We will only retain your information for as long as is necessary for providing our service to you, usually no more than 5 years after the end of the business relationship.

Rights of Individuals

Under the GDPR, individuals have:

- 1. **The right to access** –this means that individuals have the right to request access to their personal data and to ask how their data is used by the company after it has been gathered. We will provide a copy of the personal data, free of charge and in electronic format if requested.
- 2. **The right to be forgotten** if consumers are no longer customers, or if they withdraw their consent from a company to use their personal data, then they have the right to have their data deleted. We will not use their data in further processing.



- 3. **The right to data portability** Individuals have a right to transfer their data from one service provider to another. And it must happen in a commonly used and machine readable format.
- 4. **The right to be informed** this covers any gathering of data by companies, and individuals must be informed before data is gathered. Consumers have to opt in for their data to be gathered, and consent must be freely given rather than implied.
- 5. The right to have information corrected this ensures that individuals can have their data updated if it is out of date or incomplete or incorrect. We will update the information as informed.
- 6. **The right to restrict processing** Individuals can request that their data is not used for processing. Their record can remain in place, but not be used. We will not use their data for further processing, if requested.
- 7. **The right to object** this includes the right of individuals to stop the processing of their data for direct marketing. There are no exemptions to this rule, and any processing must stop as soon as the request is received. In addition, this right must be made clear to individuals at the very start of any communication.
- 8. The right to be notified If there has been a data breach which compromises an individual's personal data, we will inform the individual within 72 hours of first having become aware of the breach.

You can always exercise your right at any time by contacting us at info@remitunion.co.uk

Security Precaution

The GDPR needs organisations to take technological and operational steps to achieve a level of protection that is sufficient for an imminent danger. In the face of the rising cybersecurity threat to organisations, this has become more urgent. In order to comply with GDPR, we support tokenisation, data protection, continuous confidentiality security, integrity, availability, and resilience of processing systems and services.

Our Privacy policy is entrenched in the company's design throughout its lifecycle.

Swift Notification in Case of Coincidence or Breach

The GDPR implements mandatory reporting of security breaches and includes administrative and technological protections to minimise defined threats to personal data and to avoid data breaches. If the violation presents a high risk to its rights and freedoms, the data subject is expected to be informed without unreasonable delay. If the data breach is unlikely to result in any harm to the data topic, notification may be dispensed with.

Within 72 (seventy-two) hours of discovery, we will contact the data breach incident supervisory authority. The organisation also has an impact response plan and has educated its staff about how to respond.

Cross-border Data Transfer

- The "flow of personal data from countries outside the EU and International organisations are necessary for the expansion of international trade and cooperation."
- Being a money remittance company, our operations involve transfer of personal data of employees and clients across jurisdictions to manage our global workforce and ease operations as our processing is outsourced too but we have **Binding corporate rules** our internal codes of conduct. We export personal data from the territory of the EU to other companies within our group located in third countries.



We also follow the steps below to process EU personal data in order to comply with the GDPR:

- We will conduct privacy and data security audit. Carefully evaluate the existing data subjects' data and processing activities and detect potential inconsistency with the GDPR.
- We will ensure consent is freely given and data subjects must "opt-in" rather than "optout" of data collection schemes. We will utilise personal data strictly for the purpose of collection and keep it only as long as needed.
- We will ensure security of personal data at rest and in transit with strong encryption. Tokenisation can be adopted to ensure safeguard.
- We have developed a data security breach response scheme and comprehensive incidence response plan. We trained our employees on how to identify a breach in real-time and spot potential threat. The notification and report should be prompt.
- We will review and regularly update our privacy policy, and other documentation and communications. Information provided in our privacy policy will always be easy to understand.
- We will regularly run compliance test before implementing a new technology.
- We will ensure Cross-border data transfer policy complies with the GDPR by our binding corporate rules.

How to Contact Us

If you have any questions about our Privacy Policy or your information, please contact us in writing to; <u>info@remitunion.co.uk</u>