

Finance Incorporated Limited
Payment Processing Privacy Notice for PaymixVIA

Who we are

Finance Incorporated Limited, operating under the brand name PaymixVIA, is a payment solutions company registered in Malta and licenced by the Malta Financial Services Authority. Our processing solutions allow businesses of all sizes to take, make and manage payments in-person and online.

In our payment processing solutions, Finance Incorporated Limited acts as an independent controller when processing personal data. We may act as data processor when we offer our merchant clients certain services, processing personal data on the instructions of our clients. In providing our B2B payment processing services, including acquiring services, we are committed to respecting your privacy and protecting your personal data in accordance with the General Data Protection Regulation (the Data Protection Regulations).

This Privacy Notice explains to individuals who access or use our services, including those who interact with our websites and applications (“Sites and Services”) (“you”), how Finance Incorporated Limited uses your personal data. This includes buyers of our merchant clients as well as our merchant clients, as well as website users. When Finance Incorporated Limited uses the word “buyer” in this Privacy Notice, this means any shopper or individual whose payment transactions may be processed using Finance Incorporated Limited’s Sites and Services.

By accessing, browsing, or using our Sites and Services, you are confirming that you have read, understood, and agree to the terms of this Privacy Policy. We regularly review this Privacy Policy and may make updates from time to time. To the extent that we make a material change we will post a notice on our website. You are advised to visit this page regularly to check for updates.

Please read this Privacy Notice carefully.

General Privacy Principles

We believe everyone has a right to privacy, wherever they live in the world, and our commitment to privacy goes beyond legal compliance. As a result, our privacy and data protection compliance program applies globally, irrespective of whether there are local privacy and data protection laws. Our compliance program is based on the European Union General Data Protection Regulation (GDPR) and establishes a framework within which local privacy and data protection laws are respected, and it sets a baseline for those jurisdictions where there are no specific legal requirements.

When processing personal data, we apply the following principles:

- **Fairness and lawfulness:** we comply with privacy and data protection laws and act with integrity and fairness.
- **Transparency:** we communicate openly and transparently about our personal data processing operations.
- **Purpose limitation:** we only use personal data for defined, appropriate purposes.
- **Choices and rights:** we give individuals the ability to make simple and meaningful choices about their privacy and allow individuals, where appropriate, to access, update, or delete their personal data.
- **Privacy by design:** we maintain a respect for privacy as a key component in the design, development, and delivery of our products and services.
- **Responsible data management:** we apply appropriate data management practices to govern the processing of personal data. We carefully select external vendors and partners, and we

limit disclosure of personal data to what is described in our privacy notices or to what has been authorized by our clients. We also store personal data for no longer than what is necessary or as is required by applicable laws and to maintain accuracy of data.

- **Security:** we implement appropriate technical and organizational security measures to protect personal data against unauthorized access, use, modification, or loss.
- **Accountability:** we are accountable for living up to our commitments throughout the Finance Incorporated Limited organization.
- **Training:** all Finance Incorporated Limited employees are trained on an annual basis on privacy and security.

Data Protection Officer

We have appointed a DPO (data protection officer) to oversee compliance with this privacy policy and with the Data Protection Regulations.

You can submit a request relating to your rights mentioned in this policy here

If you have any additional questions about this privacy policy or how we handle your personal data, you can contact our DPO by sending an email to: dataprotection@paymix.eu

Please note that, in order to process your request, you may be required to provide additional information, to verify your identity. The information that you provide will be used solely for the purpose of fulfilling your request.

Individual Rights

Under applicable Data Protection Regulations, you have the following rights with respect to your personal data:

- **The right to be informed:** You have the right to be informed about the collection and the use of your personal data.
- You can request **access, correction, updates, or deletion** of your personal data;
- **The right to erasure/to be forgotten:** You have the right to request that we erase your personal data, if we have collected and processed your personal data with your consent, you can **withdraw your consent** at any time, subject to permitted or required exceptions under applicable data protection laws. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent. To the extent that we are required to keep such information, we will make efforts to limit the processing of your personal data to only what is required;
- You have the right to **object** to our processing of your personal data, under certain conditions;
- You have the right to ask us to **restrict processing** of your personal data;
- You have the right to request **portability** of your personal data and that we transfer the data that we have collected to another organisation or directly to you in a structured, commonly used and readable format.
- You have the right to **opt-out of any marketing communications** we send you at any time. You can exercise this right by writing to us at acquiring@paymix.eu. We will keep your name and email address on our CRM databases in order to prevent future communications. If you prefer your data is deleted from our CRM databases, please complete the relevant form here. If you decide you do

not want to receive marketing content from us, please note that we may still be required to send you emails regarding factual, transactional, and/or servicing information in connection with the products and services we are providing to you or the organization through which you are known to us;

- You have the right not to be subject to a decision based solely on **automated processing**, including profiling, which produces legal effects concerning you or similarly significantly affects you. Please note that we do not apply automated decision processing and if you have any concerns in this regard, you may reach out to us;

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. However, if you believe that we have not addressed your concern in a satisfactory manner, you have the right to **complain to a data protection authority** about our collection and use of your personal data at the Office of the Information and Data Protection Commissioner in Malta at:

- Email: idpc.info@idpc.org.mt
- Phone number: (+356) 2328 7100

Finance Incorporated Limited does not tolerate any retaliation against anyone who, in good faith, exercises any of these rights.

You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive, or if you refuse to comply with our requests in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your legal right to exercise any of your data protection rights. This is a security measure to ensure that personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Once we have received notification that you have withdrawn your consent, or you have made a request relating to your rights under Data Protection Regulations, we will respond to your request and will: (i) either confirm that we will no longer process your personal data information for the purpose or purposes you originally agreed to, or (ii) provide our reasoned decision as to why we are unable to grant your request. This can be due to different reasons, such as our legitimate or regulatory basis to retain your personal data.

You may exercise any of these rights by sending an email to: dataprotection@paymix.eu

Sharing your personal data

We take care to allow your personal data to be accessed only by those who really need to in order to perform their tasks and duties, and to allow third parties who have a legitimate purpose for accessing it.

Notices

Categories of Personal Data processed by Finance Incorporated Limited

With respect to data subjects whose personal data is processed by Finance Incorporated Limited for the purposes of carrying out our services and business activities, Finance Incorporated Limited may collect personal data from various sources including:

- information provided to us, either directly or via our merchants, or other clients;
- information automatically collected when you use our Sites and Services, including but not limited to our role as a payment processor;
- information collected from third parties, including but not limited to: fraud monitoring service providers, commercial databases, or know your client (KYC) service providers.

This personal data may include:

- Contact information, including but not limited to: name (first, last, and business), telephone numbers, address (home, billing, and business), fax, email address, and other communications;
- Demographic information, including but not limited to: nationality, country of residence, date of birth, marital status, birth place, gender, preferred language, citizenship;
- National Identification information, including but not limited to: national insurance number, passport, social security number, taxpayer identification number, driver license or other form of identification to verify a buyer, merchant, or other client;
- Monitoring or Recording, including but not limited to: monitoring or recording of telephone calls, emails, web chats, CCTV, access control, or other communications;
- Merchant or other Client identification, including but not limited to: merchant or client ID;
- Merchant or other Client management, including but not limited to: billing, invoicing, refunds, financial position (including debt position), reconciliations, and reporting;
- Information related to items purchased, including but not limited to: location of the purchase, value, time, method, any feedback that is given in relation to such purchase;
- Payment transaction information, including but not limited to: which payment method is used (e.g. bank transfer, pre-pay service, post-pay service, eWallets, and card schemes), transaction monitoring and fraud monitoring information (e.g. transaction values and volumes, risk scores attributed to transactions, merchant category code, IP address from where a transaction is made (optional), buyer email address (optional)), and analytics or trend analyses related to a client's sales or refunds (including chargebacks);
- Financial and credit/debit card information, including but not limited to: payment account number (PAN) or account number, card expiration date, CVC details, bank, and/or issuer details;
- Credit, fraud, sanctions, and transaction risk information, including but not limited to: information obtained about our clients from credit reference or fraud prevention agencies, including credit history, credit score, and business name, business address and any business ID (such as the registered number or VAT number), financial statements for the applicant or companies within the same group of companies as the applicant and payment transaction information from our fraud and transaction monitoring activities which relates to our clients, such as transaction types, values, and risk scores;

- Technical information, including: the IP address used to connect your computer or device to the Internet, your device ID, login information (username/password), browser type and version, time zone setting, browser plug-in types and versions, device operating system platform, mobile carrier, location, or GPS/geo-location;
- Information about your visit or whether you opened an email, including: the full Uniform Resource Locators (URL) clickstream to, through and from Finance Incorporated Limited's site (including date and time), products or 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), methods used to browse away from the site page, any phone number used to call Finance Incorporated Limited's client service number;
- Publicly accessible comments and opinions reviewed and used by Finance Incorporated Limited, through Internet searches or posted on social networking sites, such as Facebook and LinkedIn;
- Applications, if you download or use mobile or desktop applications, including information about your location, your device or the service you are using, including where a payment transaction takes place.

Who Finance Incorporated Limited shares your information with:

Finance Incorporated Limited may make personal data available to:

- other parts of Finance Incorporated Limited or Finance Incorporated Limited group companies;
- third-party service providers, including information technology service providers (for cloud computing), risk, fraud, and compliance service providers (for transaction risk monitoring); and for business analytics (e.g. for data aggregation, visualization and reporting);
- our business partners, including payment gateway providers, card payment processors, payment infrastructure providers, banks, and other financial institutions;
- advertisers (where a Finance Incorporated Limited client opts-in to this service);
- our professional legal advisors (accountants, consultants, lawyers, and tax advisors);
- law enforcement, regulatory, prosecuting, tax or governmental authorities, courts, other tribunals, or dispute resolution bodies;
- prospective sellers or buyers as part of a sale or merger of our company, business, or assets; and
 - any other third party to the extent the disclosure is required by a law which applies to us.

Transfers of Personal Data

Finance Incorporated Limited is based in Malta, in the European Union and almost all data we process will remain in the European Union/European Economic Area ('EU/EEA'). Our third-party service providers operate in the EU/EEA, but may also operate in other countries around the world outside of the EU/EEA.

We may transfer, access or store personal data about you outside of the EEA, including countries such as Switzerland and the United Kingdom, as well as the United States of America. If we do, we will make sure an adequate level of protection is provided for the personal data by using one or more of the following approaches:

1. We may transfer personal data to countries that have privacy laws that have been recognized by the country from which the data is transferred as providing similar protections for the data ("adequacy").

2. We may enter into written agreements, such as Standard Contractual Clauses (as approved by the European Commission) and other data transfer agreements, with recipients that require them, in substance, to provide the same level of protection for the data.
3. We may seek your consent for transfers of your personal data for specific purposes.
4. We may rely on other transfer mechanisms approved by authorities in the country from which the data is transferred.

Storing and retaining your personal data

We securely store your data by maintaining industry approved safeguards designed to protect the personal data provided or collected against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or misuse. Such data is also routinely backed up at secure locations in Europe and outside in accordance with standard industry practice. The industry practice specifically related to the Fintech sector is reviewed annually and we update our security measures accordingly. That said, no method of transmission over the Internet, or method of electronic storage, is 100% secure, however, therefore, we cannot guarantee its absolute security. If you have any further questions about privacy or security or have reason to believe your data security has been compromised please contact us immediately by sending an email to: dataprotection@paymix.eu

We will only retain your personal data for as long as necessary to fulfil the purposes for which it is collected in accordance with our retention policy. This includes retaining your data for the purposes of satisfying any legal, accounting, or reporting requirements. When deciding on the applicable retention periods, we consider our regulatory and legal obligations, the processing purposes, nature and sensitivity, potential risk of harm from unauthorized use or disclosure. We also take into consideration best practices applied in the industry.

We take measures to delete or permanently de-identify personal data as required by law or if it is no longer required for the purpose for which it was collected. Certain data relating to transaction records, particularly billing and statement information, may be required to be safeguarded for significant periods of time in accordance with standard tax and accounting practices, or to enable the refund and chargeback requests to be processed on behalf of our customers; additionally such data may be stored to account for requirements relating to financial crime based on the applicable regulations and our company data classification and retention policy.

Why Finance Incorporated Limited processes personal data

We collect, use and store your personal data for the reasons stated in the table below.

We may also use your personal data so long as the use is not incompatible with the original purpose for which we obtained our personal data and for any other purpose that we specifically tell you about.

In some cases, we may require you to provide your personal data because of a legal or contractual duty, and your failure to provide the information in these circumstances could result in us being unable to fulfil our relationship with you.

Purpose of processing		Legal ground(s) for use
Designing, evaluating, benchmarking, and administering:	Finance Incorporated Limited product and service offerings and their relevance for particular merchants or clients.	Finance Incorporated Limited relies on: <ul style="list-style-type: none"> • Consent to send promotional

Education, training, and awareness programs for our merchants or other clients.	<ul style="list-style-type: none"> material (if required); Article 6.1.a GDPR Finance Incorporated Limited's legitimate interests in protecting and enforcing its rights or to send promotional material; Article 6.1.f GDPR Finance Incorporated Limited's legitimate interests in developing and improving products and services; Article 6.1.f GDPR and
Sales and marketing campaigns.	
Offers of products, services, and contracts.	
Accounts receivable, accounts payable, bad debt and reserves; bank	

	accounts for payments and receipts.	<input type="checkbox"/> The need to process personal data to provide a requested product or service or to fulfil a contract. Article 6.1.b GDPR
Assembling, maintaining, and disseminating:	Client-specific job assignments for sales, marketing, and collections	on: Incorporated Limited relies <ul style="list-style-type: none"> <input type="checkbox"/> Finance Incorporated Limited's legitimate interests in the administration of its business or in meeting internal record-keeping requirements; Article 6.1.f GDPR <input type="checkbox"/> Finance Incorporated Limited's legal obligations under tax, audit, or regulatory law to maintain internal records Article 6.1.c GDPR; <input type="checkbox"/> Finance Incorporated Limited's legitimate interest in assisting its merchants or other clients to understand their transactions or its contractual obligation to provide this information. Article 6.1.f GDPR and
	Client directories	
	Emergency contact information for merchants or other clients	
	Identification credentials	
	Internal record-keeping and reporting, including reporting on credit and financial risk	
Providing reports and analytics to our merchants or other clients		
Supporting, monitoring, auditing, executing, and facilitating:	Business conferences and travel	<ul style="list-style-type: none"> Consent; Article 6.1.a GDPR Finance Incorporated Limited's legitimate
	Business negotiations and transactions (including due diligence)	

Business operations, including client billing	interests in the administration of its business
Business transition activities, including mergers, acquisitions, and divestitures	Article 6.1.f GDPR;
Company marketing efforts, including websites, conferences, brochures, and other promotional media events and materials	<ul style="list-style-type: none"> • Finance Incorporated Limited's legitimate interests in protecting the integrity of Finance Incorporated Limited services, facilities, and systems.
Compliance with contractual obligations, client service, support, or account management	<p>Article 6.1.f GDPR</p> <ul style="list-style-type: none"> • Finance Incorporated Limited's legitimate interests in preserving records for business purposes, assuring security

Identification for security and systems/ facility authentication	at its facilities and systems, and making merchant or other client contact information available to relevant employees;
Internal and external business communications and management reporting	<p>Article 6.1.f GDPR</p> <ul style="list-style-type: none"> • Finance Incorporated Limited's legitimate interests in promoting, developing, and improving products and services <p>Article 6.1.f GDPR;</p> <p>and</p> <ul style="list-style-type: none"> • The need to process personal data in order to provide a requested product or service or to fulfill a contract. <p>Article 6.1.b GDPR</p>

Complying with:	Applicable laws and regulations and industry requirements, including reporting and disclosure obligations	<p>Finance Incorporated Limited relies on:</p> <ul style="list-style-type: none"> Legal obligations to process personal data under applicable EU, or EU Member State law; <p>Article 6.1.c GDPR</p> <ul style="list-style-type: none"> Finance Incorporated Limited's legitimate interests to comply with non-EU or EU Member State laws and regulations, or industry (e.g., card scheme or Payment Card Industry) requirements <p>Article 6.1.f GDPR;</p> <p>and</p> <ul style="list-style-type: none"> Finance Incorporated Limited's legitimate interests in protecting and enforcing its rights. <p>Article 6.1.f GDPR</p>
Conducting:	Audits and accounting, financial and economic analyses (including to assess financial and insurance risks)	<p>Finance Incorporated Limited relies on:</p> <ul style="list-style-type: none"> Legal obligations under EU, or EU Member State audit, tax, or regulatory laws. <p>Article 6.1.c GDPR</p> <ul style="list-style-type: none"> Finance Incorporated Limited's legitimate interests in meeting non- EU, or EU Member State audit, tax, or regulatory requirements.
	In accordance with local law, investigations into alleged policy or contractual violations by merchants or other clients	
	Opinion and engagement surveys	

		<p>Article 6.1.f GDPR</p> <ul style="list-style-type: none"> • Finance Incorporated Limited's legitimate interests in analyzing performance, understanding Finance Incorporated Limited merchant or other client preferences; <p>Article 6.1.f GDPR</p> <ul style="list-style-type: none"> • Finance Incorporated Limited's legitimate interests in protecting the integrity of Finance Incorporated Limited Sites and Services, operations, facilities, and systems <p>Article 6.1.f GDPR; and</p> <ul style="list-style-type: none"> • Finance Incorporated Limited's legitimate interests in protecting its rights. <p>Article 6.1.f GDPR</p>
Protecting:	Security of Finance Incorporated Limited assets by implementation of identity authentication and other security measures, control of access to Finance Incorporated Limited and client workplaces and systems, monitoring of activity in Finance Incorporated Limited work locations and execution of backup and storage procedures.	<p>Finance Incorporated Limited relies on:</p> <ul style="list-style-type: none"> □ Finance Incorporated Limited's legitimate interests in protecting its rights, the integrity of Finance Incorporated Limited services, operations, facilities, and systems, and preventing fraud or the misuse of Finance Incorporated Limited services. <p>Article 6.1.f GDPR</p>

<p>Preventing, detecting, and assisting in the prevention, detection or prosecution of:</p>	<p>Crime, including fraud, sanctions offences and money laundering</p>	<p>Finance Incorporated Limited relies on:</p> <ul style="list-style-type: none"> • Finance Incorporated Limited’s legal obligations under EU, or EU Member State law; <p>Article 6.1.c GDPR</p> <ul style="list-style-type: none"> • Finance Incorporated Limited’s legitimate interests in conducting sanctions and anti-money laundering screening, and meeting nonEU, or EU Member State
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		<p>legal or regulatory requirements;</p> <p>Article 6.1.f GDPR</p> <p>and</p> <ul style="list-style-type: none"> □ Finance Incorporated Limited’s legitimate interest in protecting and enforcing its rights and property. <p>Article 6.1.f GDPR</p>
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<p>Monitoring, and auditing, reviewing:</p>	<p>Communications and information on company systems, including email and website usage</p>	<p>Finance Incorporated Limited relies on:</p> <ul style="list-style-type: none"> • Finance Incorporated Limited’s legitimate interests in protecting the integrity of Finance Incorporated Limited services; Article 6.1.f GDPR <p>and</p> <ul style="list-style-type: none"> • Finance Incorporated Limited’s legitimate interests in protecting and enforcing its rights, protecting the integrity of Finance Incorporated Limited services, operations, facilities and systems, and staff, and preventing fraud or the misuse of Finance Incorporated Limited’s services. <p>Article 6.1.f GDPR</p>
	<p>Compliance with company policies, procedures, and processes</p>	
	<p>Activity in company work locations</p>	

<p>Preparing for, defending, participating in responding to:</p>	<p>E-discovery requests for information Litigation or potential litigation and other types of dispute resolution (including complaints)</p>	<p>Finance Incorporated Limited relies on:</p> <ul style="list-style-type: none"> Legal obligations to participate in legal or complaints processes under EU, or EU Member State law; <p>Article 6.1.c GDPR</p> <ul style="list-style-type: none"> Finance Incorporated Limited's legitimate interests in participating in legal or complaints processes under non-UK, EU, or EU Member State law, regulatory or industry requirements; <p>Article 6.1.f GDPR</p> <p>and</p> <ul style="list-style-type: none"> Finance Incorporated Limited's legitimate interests in protecting and enforcing
		<p>its rights. Article 6.1.f GDPR</p>
<p>Communicating and sharing of information with Finance Incorporated Limited companies or potential or actual acquirers of Finance Incorporated Limited companies or businesses for:</p>	<p>Internal administration and business management and planning purposes</p>	<p>Finance Incorporated Limited relies on:</p> <ul style="list-style-type: none"> Legal obligations relating to audit, tax, or compliance requirements under EU, or EU Member State law; <p>Article 6.1.f GDPR</p> <p>and</p> <ul style="list-style-type: none"> Finance Incorporated Limited's legitimate interests to structure its business appropriately and to meet non-EU or EU Member State requirements relating to audit, tax, or compliance. <p>Article 6.1.f GDPR</p>
<p>Processing and administering:</p>	<p>Tax and other required withholdings Reimbursements for business travel and other reimbursable business expenses</p>	<p>Finance Incorporated Limited relies on:</p>

	Invoices, payments, cash balances, and accounting	<ul style="list-style-type: none"> • Legal recordkeeping and reporting obligations under EU or EU Member State law; Article 6.1.c GDPR • Finance Incorporated Limited's legitimate interests in protecting its rights and meeting non- EU or EU Member State recordkeeping and reporting requirements; Article 6.1.f GDPR and <ul style="list-style-type: none"> • The need to process personal data to fulfil contractual obligations. Article 6.1.b GDPR
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Additional Notices

Correspondence with Finance Incorporated Limited via email

Finance Incorporated Limited uses a variety of tools to maintain the security of our IT infrastructure, including our email facilities. Examples of such tools are:

- Systems that scan incoming emails to Finance Incorporated Limited recipients for suspicious attachments and URLs in order to prevent malware attacks
- Tools that provide end-point threat detection to detect malicious attacks
- Tools that block certain content or websites

If you correspond via email with a Finance Incorporated Limited recipient, your emails will be scanned by the tools we operates to maintain the security of our IT infrastructure, which could result in content being read by authorized Finance Incorporated Limited persons other than the intended recipient.

Legal grounds for processing personal data of individuals who correspond with Finance Incorporated Limited via email:

Our legitimate interest in protecting our IT infrastructure against unauthorized access or data leakage	Article 6.1.f GDPR
Our legitimate interest in analysing email traffic	Article 6.1.f GDPR

Correspondence with Finance Incorporated Limited via Finance Incorporated Limited phone and voice mail services

When you call representatives of Finance Incorporated Limited, only your phone number may be stored on our servers. No other personal data is collected but technical logs and reports may be stored for trouble shooting purposes.

Recording of client phone calls

Client phone calls to support desks operated by Finance Incorporated Limited may be recorded. Finance Incorporated Limited will always inform the caller that the call is being recorded and the reasons for recording. Where required under applicable law, Finance Incorporated Limited will obtain the caller's consent. Recording will be initiated for reasons of improving quality of client service, dispute resolution, regulatory and compliance, and training of staff.

Legal grounds for processing personal data of individuals who correspond with Finance Incorporated Limited via phone and voicemail services:

Our legitimate interest in maintaining communication networks	Article 6.1.f GDPR
Our legitimate interest in improving client service, dispute resolution, and training of staff	Article 6.1.f GDPR
Compliance with a legal obligation	Article 6.1.c GDPR
Consent (for the processing of sensitive personal data, such as biometric data)	Article 9.2.a GDPR

Law Enforcement

Finance Incorporated Limited respects the rules and laws of the jurisdiction in which it operates, as well as the privacy and rights of its clients. Accordingly, Finance Incorporated Limited provides client information in response to law enforcement or other public authority requests only when we reasonably believe we are legally required to do so. To protect our clients' rights, we carefully review requests to confirm they comply with the law and are within the powers of the requesting authority or law enforcement official.

To obtain client information from Finance Incorporated Limited, public authority and law enforcement officials must provide legal process appropriate for the type of information sought, such as a subpoena, court order, or a warrant.

Finance Incorporated Limited reviews all governmental requests for data. Finance Incorporated Limited strictly construes requests for data and seeks to limit or object to requests that are overbroad or seek a large amount of information or affect a large number of users. Finance Incorporated Limited reserves the right to appeal any request for information, where available, and shall not disclose the requested information until required to do so under applicable procedural rules. Finance Incorporated Limited may receive requests from law enforcement agencies in Malta and elsewhere, seeking data processed by Finance Incorporated Limited. To make an inquiry to the Finance Incorporated Limited team, please contact: legal@paymix.eu

Marketing

We are committed to ensuring you only receive the marketing communications you want from us and will never send you unsolicited marketing communications.

If you are our client or requested marketing information from Finance Incorporated Limited and have opted in or have not opted out of receiving marketing communications as required by law, we may contact you about relevant products or services via physical mail, telephone, text message, and email. We may also send you marketing communications if you have signed up and provided your consent at a trade show or conference.

If you wish to receive marketing communications from Finance Incorporated Limited, you can sign up by providing your name, email address, and phone number via the subscription preferences form on our website or other digital channels. By completing and submitting this form, you indicate your consent to receive marketing content via the communication method selected including email, telephone, physical mail, and/or text message at the information provided. Message and data rates may apply. Message frequency varies. At any time, you can stop receiving marketing communications by contacting us via dataprotection@paymix.eu, Our action will be subject to any applicable limitations of the laws of your home jurisdiction.

We may indirectly market to you via our website or social media. You can download content, for example white papers and research reports, from our website or social media using the forms designed for this purpose. We collect and process the data you fill out on the form, including your name, company, country, and email address to provide you with content you requested and for our legitimate interest of tracking who downloads our content. We will not add you to our marketing distribution lists unless you have provided your consent.

We do not share your information with third parties to directly market to you unless you have provided your consent.

Legal grounds for processing personal data for marketing purposes are:

Consent	Article 6.1.a GDPR
Our legitimate interest in developing our business	Article 6.1.f GDPR
Our legitimate interest in sending you direct marketing communications to keep you informed about products and services and to invite you for relevant events	Article 6.1.f GDPR

Suppliers

We process personal data about our suppliers (including subcontractors, and individuals associated with our suppliers and contractors) in order to manage our relationship and contract and to receive services from our suppliers.

The personal data we process is generally limited to contact information (name, name of supplier, phone, email, and other contact details) and financial information (payment-related information).

Before we take on a new supplier, we perform compliance searches that could include – depending on the risk level - for example anti-money laundering, anti-bribery and anti-corruption checks, modern slavery audits, adverse media checks, Politically Exposed Persons (PEPs) searches, and/or Sanction Lists checks.

Legal grounds for processing personal data of our suppliers are:

Performance of a contract	Article 6.1.b GDPR
Compliance with a legal or regulatory obligation	Article 6.1.c GDPR
Our legitimate interest in managing payments, fees, and charges, and to collect and recover money owed to Finance Incorporated Limited	Article 6.1.f GDPR
Our legitimate interest in safeguarding against Finance Incorporated Limited inadvertently dealing with the proceeds of criminal activities or assist in any other unlawful or fraudulent activities (for example, terrorism)	Article 6.1.f GDPR

Visitors to our websites and other digital channels

Personal data that we collect about you when you visit our website (“site”) and other digital channels (hereinafter referred to as ‘our site’) falls into several categories.

Information that you provide voluntarily

We collect personal data you provide voluntarily through our site, for example, when completing online forms to contact us, subscribing to a newsletter, subscribing to receive marketing communications from us, participating in surveys, or registering for events we are organizing. The information we collect about you includes the following:

- Name
- Job title, job level or job function, role
- Education
- Company or organization
- Company data
- Contact information, including primary email, email address, and telephone numbers
- Demographic information, such as industry, country, postcode, preferences, and interests
- Other information relevant to client surveys or similar research
- Information relating to events captured through event-related forms, such as dietary restrictions, hotel and flight information, registration/participation status, media interview attendance, previous event experience, and gender
- Information pertinent to providing goods and services to you
- Any other personal data you voluntarily choose to provide to us

We do not intentionally collect sensitive personal data, unless you provide us with such data. While there may be free text boxes on the site where you are able to enter any information, we do not intend to process sensitive personal data. You are not required to provide, and should not disclose, sensitive personal data. If you choose to provide any sensitive personal data in this manner, you acknowledge you consent to the collection and processing of this sensitive information.

If you register on our website, your personal data will be stored in our Client Relationship Management (CRM) system. If you have opted out of receiving marketing communications, your basic contact details will remain on our opt-out list.

Information we collect automatically

When you visit our site, we collect certain personal data automatically from your device. Specifically, the data we collect automatically may include information, such as your IP address, pixel ID, device type, unique device identification number, browser type, operating system, broad geographic location (e.g., country or city-level location), and other technical information. We also collect information about how your device has interacted with our site, including the pages accessed, current URL, time you visited the site, and links clicked. Collecting this information enables us to better understand the visitors who come to our site, where they come from and what content on our site is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our site to our visitors. Information will be collected using cookies and similar tracking technology, as explained further in our Cookie Notification.

Purposes for which we process your personal data as a visitor to our site are:

- To administer and manage our site, including to confirm and authenticate your identity, and prevent unauthorized access to restricted areas of our site (for example, we may confirm your IP address matches the location entered into our online forms or may confirm you are not listed as a restricted party with whom we are legally prohibited from doing business);
- To personalize and enrich your browsing experience by displaying content (including targeted advertising) that is more likely to be relevant and of interest to you
- To analyse the data of visitors to our site and site traffic information

- To capture web metrics about the journey of users within our site
- To determine the company, organization, institution, or agency you work for or with which you are otherwise associated
- To develop our business and services
- To deliver products and services to our clients to provide them with information about such products or other legitimate business purposes
- To provide you with marketing communications
- To conduct benchmarking and data analysis (for example, regarding usage of our site and demographic analyses of visitors of our site)
- To understand how visitors use the features and functions of our site
- To monitor and enforce compliance with applicable terms of use
- To conduct quality and risk management reviews
- To enable the better management of our events
- To enable teams managing events to coordinate their email campaigns and event notifications more effectively
- To allow for event and webinar sign-up
- To allow for content download and lead capturing
- To allow services and information to be delivered effectively to you
- Any other purpose for which you provided information to Finance Incorporated Limited

When you contact us or request us to contact you

Via our website, or other digital channels, you can contact us or ask us to contact you regarding questions, queries, (support) requests, comments or complaints, fill out an application to become a client, merchant or a partner or sign up for an account. When you do this, we collect the information you supply, including your name, company, contact details, the reason you are contacting us, verification you are not a robot and other information you provide us with. You can also contact us by calling us or emailing us using, for example, the contact details listed on our website. If you do so, we will collect your name, company, and any other information we need to be of further assistance to you and/or communicate with you.

We use the aforementioned data to answer your questions, comments, complaints, respond to your queries and (support) requests, and to assess your application to become a client or partner. As such, this data is used by us to establish or perform our (future) contract with you and for our legitimate interests in following up with you. We also use the data above for our legitimate interest of conducting business with you and managing our internal administration, for training purposes, for establishing and performing our contract with you, for our legitimate interest of conducting marketing research, so we can improve our products and services and to offer our (future) clients tailored products and services.

Geolocation data

When you use our mobile apps, we collect and use geolocation information linked to your device, with your permission, and were permitted by local law. Finance Incorporated Limited uses this data as part of its processes to prevent and detect fraudulent card use and send alerts. Where permitted by local law, Finance Incorporated Limited may monitor your geolocation information in the background while the mobile app is being used. You may change location permissions at any time either directly in the mobile app or in your device settings.

Minors

Finance Incorporated Limited does not knowingly solicit or collect personal data from children under the age of thirteen (13) without verifiable parental consent. If Finance Incorporated Limited learns that a child under the age of thirteen (13) has submitted personal data without parental consent, Finance Incorporated Limited will take all reasonable measures to delete such information from our databases and not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware that we have collected any personal data from children under the age of thirteen (13), please contact us at dataprotection@paymix.eu

Finance Incorporated Limited website(s) are not directed at persons under the age of 18. Finance Incorporated Limited does not knowingly collect, maintain, or use personal data from persons under the age of 18 on any Finance Incorporated Limited website. If you are under the age of 18 years, please do not register or otherwise provide information to Finance Incorporated Limited on Finance Incorporated Limited website. Minors under 18 years of age may request to have the personal data they have provided to us deleted by sending an email requesting deletion to dataprotection@paymix.eu

Please note, while we make reasonable efforts to comply with such requests, deletion of your personal data does not confirm complete and comprehensive removal of that data from all our systems.

Cookies and tracking on Finance Incorporated Limited websites and apps

When visiting Finance Incorporated Limited's corporate website, <https://financeincorp.com>, users are not immediately tracked and have the option to accept cookies by selecting "Accept". By not selecting the "Accept" option or by blocking specific types of cookies, Finance Incorporated Limited will not install non-essential cookies.

Legal grounds for processing personal data of visitors of our site are:

Our legitimate interest in the effective delivery of information and services to you, and the effective and lawful operation of our businesses	Article 6.1.f GDPR
Our legitimate interest in responding to questions, comments, complaints, respond to queries	Article 6.1.f GDPR
Our legitimate interest in developing and improving our sites and digital channels and your user experience	Article 6.1.f GDPR
Explicit consent of the visitor	Article 6.1.a GDPR

Data storage and security practices

Finance Incorporated Limited maintains a robust security framework supported by a comprehensive suite of policies and procedures that govern all aspects of data protection. The Information Security Policy establishes clear guidelines for safeguarding the confidentiality, integrity, and availability of data across the organization. Access to sensitive information, including cardholder and authentication data, is strictly limited to authorized personnel with a legitimate business need, and is enforced through technical controls such as strong encryption, data loss prevention systems, and multi-factor authentication. Employees are required to adhere to strict password policies, lock workstations when unattended, and use only company-approved software and devices. Portable devices are managed with local firewalls and are prohibited from connecting to the company network unless explicitly

authorized. All software installations and changes to system configurations are subject to documented approval and testing processes.

Network security is further reinforced by the Network Security procedures, which mandates the use of firewalls, segmentation, and anti-spoofing measures to restrict traffic between trusted and untrusted networks. Regular reviews of network diagrams, data-flow diagrams, and firewall rules are conducted to ensure that only necessary traffic is permitted and that all configurations remain current and secure. Data transmission policies require the use of strong cryptographic protocols (minimum TLS 1.2) for all sensitive data transfers and prohibit the use of insecure channels such as wireless networks, email, or instant messaging for transmitting cardholder data. Data retention and disposal procedures ensure that personal and sensitive data is retained only for the minimum period required, with secure deletion methods applied to both electronic and physical media. Employees receive annual security awareness training, and a documented incident response plan ensures prompt and effective action in the event of a suspected breach. These integrated policies and procedures collectively support Finance Incorporated Limited's commitment to proactive data protection, regulatory compliance, and continuous risk management.