

## Privacy Policy ICEPAY

### Introduction

Icepay B.V. (“ICEPAY” or “we”) operates the website <https://icepay.com/>.

This Privacy Statement informs you of the policies we have in place regarding the collection, use, processing, sharing and transferring of the Personal Data that we retrieve from you when you visit our website or use our services. By using our website, you agree to the collection, use and disclosure of your personal data in accordance with this Privacy Statement.

### Privacy Statement

ICEPAY respects your privacy and all personal data will be treated confidentially. Respect for the privacy of customers is the starting point for all ICEPAY activities. ICEPAY will use your personal data in accordance with the applicable legislation. This statement is part of the Code of Conduct that the employees of ICEPAY endorse and comply with.

### What Personal Data do we collect?

We collect Personal Data about you when you visit our Sites or use our Services, including the following:

Personal Data - our registration forms request users to provide us with personal (such as name, address, email, phone number, ID details including date of birth, address) and business information (such as company activities, management, registration details, etc.).

ICEPAY registers this Personal Information:

- To get in touch with you, once you registered on our website, or requested an information from us;
- To share with you information about ICEPAY services and marketing communication, that might be of interest to you;
- To process the registration and onboarding of your company with us;
- To provide Payment Services, according to the Platform Contract you sign with us;
- To perform financial transactions, maintain and improve our services and to deliver the information and support you request;
- To verify your identity, to investigate and prevent fraud or other illegal activities, to protect our rights and property and for any other purpose mentioned in our [Terms and Conditions](#).
- To comply with the rules and regulations.

Log Data – while using our website and/or applications, we may collect information that your browser sends us. This may include your computer’s Internet Protocol (IP) address, browser type, browser version, website visits, length of visit and page views.

## Why do we collect Personal Data?

Personal Data collected on our website may be used for the following purposes:

- to contact you when you have submitted a web-form on our website;
- to send you information of which we think that it may be of interest to you;
- to send you marketing communications relating to our business;
- to comply with laws and regulations.

We collect and retain Personal Data submitted to ICEPAY in an identifiable format for the amount of time necessary to meet your request or fulfill our contractual obligations towards you, or to fulfill our legal or regulatory obligations, unless it is in our legitimate business interests and not prohibited by law to maintain the Personal Data for longer periods.

## How do we process Personal Data?

We may Process your Personal Data for a variety of reasons that are justified under the data protection rules and regulations.

In performing the Payment Services (as agreed and specified in the ICEPAY Terms & Conditions, in accordance with fulfilling our contractual obligations under the Platform Contract), and operating the platform sites, the following activities may include the Processing of Personal Data:

- authentication of your access to an account;
- communication with you about your account, the website, the services;
- management of our business needs, such as monitoring, analysing, and improving our services;
- assessment and acceptance of (potential) Customers as part of the onboarding / customer due diligence process (performance of the company checks, evaluation of applications, and comparison of information for accuracy and verification purposes);
- performance of (targeted) marketing activities designed to establish a relationship with a Customer and/or maintain or extend a relationship with a Customer;
- management of risk and protection of the services and you from fraud by verifying your identity, and helping to detect and prevent fraud and abuse of our services;
- forwarding to external suppliers relating to activities aimed at preventing and combating fraud;
- performing sanction checks and PEP (politically exposed person) checks on directors and ultimate beneficial owners of Customers;
- creation of an account connection between your account and a third-party payment method (as requested by you) and forwarding of transaction details to the relevant payment method supplier/acquirer (sub-processors) for settlement purposes;
- providing information on its Customers/transactions to supervisory bodies, if a transaction is considered unusual; and

- compliance with our obligations and to enforce the terms of our services, including to comply with all applicable laws and regulations.

### Do we need your consent to process Personal Data?

Whilst we always want you to be aware of how we are using your Personal Data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day business activities, we may use your Personal Data without asking for your consent, if:

- processing is necessary for the performance of a contract, or is needed to enter into the contract;
- processing is necessary for compliance with a legal obligation to which we are subject to;
- processing of data is necessary for our own legitimate purposes (such as the administration and management of our business and the improvement of our services), and by doing so will not interfere with your privacy rights.

In exceptional circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent.

With your consent, we will use your Personal Data:

- To get in touch with you, once you registered on our website, or requested an information from us;
- To share with you information about ICEPAY services and marketing communication, that might be of interest to you;
- In the performance of (targeted) marketing activities designed to establish, maintain and/or extend a business relationship.

If you do give consent to ICEPAY, you can always change your mind and withdraw it at a later date.

### Do we share Personal Data?

Your Personal Data may be shared with third parties/recipients:

- If we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request,
- To complete an application or processes (requested by you),
- In delivery of the Payment Services and the Platform Contract fulfilment, ICEPAY may share certain Personal Data with the Payment Methods Providers.

We may share information with the other participants on your transactions, including other users you are sending or receiving funds from, and other service providers when you use the payment services. The information includes:

- Personal Data necessary to facilitate the transaction;
- Personal Data to help other participant(s) resolve disputes, detect and prevent fraud.

## International Transfers of Personal Data

Personal Data may be transferred to third countries or international organisations only if there is an appropriate level of protection and the Customer has given specific consent for this in writing.

ICEPAY is exclusively entitled to these transfers to third countries or international organisations, unless a provision under EU law or under Member State law requires ICEPAY to perform Processing. In that event, ICEPAY shall notify the Customer of this provision prior to the Processing, unless that legislation prohibits such notification for serious reasons of general interest.

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. ICEPAY makes sure that the parties we cooperate with has the same level of privacy protection as required under the GDPR, and in case of a transfer outside of the EU, we will rely on corporate rules and contractual protections.

## Your rights and the Management of Personal Data

You have certain rights in respect of your Personal Data. In particular, you have a right of access, rectification, restriction, opposition, erasure and data portability.

You can view and change your personal data at all times by logging in to the ICEPAY portal (except for changing the Company name). All change requests will be reviewed by our Underwriting Department and approved if correct. Our [Customer Service Department](#) may be contacted during office hours for all general questions. Our Compliance Department may be contacted for escalated issues regarding privacy, Personal Data and notifications on incidents and Data Breach.

### Compliance Department

[compliance@icepay.com](mailto:compliance@icepay.com)

ICEPAY B.V., Att. Compliance Manager

Nachtwachtlaan 20

1058 EA Amsterdam

The Netherlands

### Customer Service

[info@icepay.com](mailto:info@icepay.com)

ICEPAY B.V.

Nachtwachtlaan 20

1058 EA Amsterdam

The Netherlands

We kindly remind you that changing or deleting your personal information may limit the use of the services offered by ICEPAY. Changing or deleting your personal data will not affect your contractual agreement with ICEPAY. This agreement remains unchanged for the agreed duration.

## Security - How do we protect Personal Data?

ICEPAY maintains technical, physical, and administrative security measures designed to provide reasonable protection for your information against loss, misuse, unauthorized access,

disclosure, and alteration. The security measures include firewalls, data encryption, online and physical access controls to our data centers, and information access authorisation controls.

Where ICEPAY engages with third-party suppliers to provide services, that may be able to access Personal Data, we require them to have similar security controls in place.

While we are dedicated to securing our network, systems and services, you are responsible for securing and maintaining the privacy of your password(s) and account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorised.

## Cookies

Our website uses cookies. Cookies are small data files that enable us to store certain login information and directly connect with the system of the user. Cookies cannot be used to identify individuals, only devices and facilitate a more user friendly service like preferences etc. Every visitor can set up their computer to prevent cookies from being accepted. For detailed information on cookie us, please refer to the ICEPAY [Cookies page](#).

## Privacy Policy updates

ICEPAY reserves the right to change this privacy policy at all times. It is your responsibility to periodically verify the applicable policy and to comply with the most recent version. All changes will be posted on our website.