

# Privacy Policy

**Cyberstar s.r.o.**



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# 1. Introduction

Privacy Policy is constantly evolving, and the Company (Cyberstar s.r.o) as the company that is registered in Czech Republic, will take all commercially reasonable efforts to maintain up-to-date and effective online privacy standards and practices.

You are under no obligation to provide us with **Personal Data** of any kind, however Your refusal to do so may prevent You from using certain features of the website.

The Company is committed to respecting Your online privacy and recognizes Your need for appropriate protection and management of any personally identifiable data ("**Personal Data**") You share with us.

The Company strives to comply with all applicable laws around the globe that are designed to protect Your privacy. Although legal requirements may vary from country to country, The Company will adhere to the principles set forth in this Privacy Policy even if, in connection with the above, they transfer Your Personal Data from Your country to countries that may not require as stringent levels of protection for Your Personal Data. In other words, The Company goal is to provide protection for Your Personal Data no matter where that Personal Data is collected, transferred, or retained.

If You choose to provide The Company with Your Personal Data through its Website, Mobile App, or by facsimile, mail, or e-mail, The Company may transfer that Personal Data within The Company and transfer that Personal Data to The Company Third Parties service providers, merchants with whom You have made transactions with for the purpose of assisting the merchant in resolving disputes across borders, and from Your country or jurisdiction to other countries or jurisdictions around the world.

The Company also collects government-issued identification numbers ("**ID Numbers**") to comply with existing Know Your Customer government regulations.

This Privacy Policy describes how The Company collects, uses, stores, shares and protects your Personal Data whenever you use our Services through our website including any other media channel, mobile website, or mobile application whenever you communicate with us or get into contact with the Services of The Company in any way, stated above.

**To protect Your privacy, The Company has adopted the following principles:**

- A. Notice
- B. Choice
- C. Security
- D. Access / Accuracy

This privacy statement is written in accordance with **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016**, the General Data Protection Regulation (hereinafter referred to only as the "**GDPR**") and **the Czech act No. 110/2019 Coll., the Personal Data Processing Act**. For the contact details of our Data Protection Officer, please see the "Query or Complaint" section.



We expect you to read this entire document carefully and accept it before the use of our Services. If you do not agree with this Privacy Policy, then you should refrain from using our Services or opening an Account. This Privacy Policy forms an integral part of terms and conditions, governing the relationship between The Company and its customer.

You are encouraged to periodically review this Privacy Policy. From time to time, we may change this privacy statement. Depending on the nature of the change, we will inform You of any such change through our written communications with You or through our website, The Company.

## 2. Definitions

- a) **Account**– means the account created by The Company to its Customer.
- b) **Business Partners** - third parties with whom we conduct business and have a contractual relationship, such as processors, suppliers, distribution partners.
- c) **Customer** - means any individual or legal entity opening or holding account with The Company.
- d) **Derivative Information** - information our servers automatically collect when You access the Site, such as Your IP address, browser type, operating system, access times, and the pages You have viewed directly before and after accessing the Site. If You are using our mobile application, this information may also include Your device name and type, Your operating system, phone number, country, likes and replies to a post, and other interactions with the application and other users via server log files, as well as any other information You choose to provide.
- e) **Financial Information** - financial data, such as data related to Your payment method (name on the card, partial PAN number, card brand), that we may collect when You make transactions, exchange, or request information about our services from the Site.
- f) **Firmographic data** - the information You voluntarily provide about Your company, such as, company name, company website, company location, industry and company size.
- g) The Company or **We, Cyberstar s.r.o., Kodaňská 1441/46, 101 00 Prague, CZ, ID No. 07717261** – means the company You are establishing customer relationship with.
- h) **Mobile App** – means the Company app
- i) **Personal Data** - personally identifiable information, such as Your name, shipping address, email address, telephone number; demographic information, such as Your age, gender, hometown, and interests, place of work, username and passwords that You voluntarily give to us when You choose to participate in various activities related to the Site such as online chat and message boards, followed by subscription to newsletters and promotional emails.



- j) **Privacy Policy** - means this privacy policy of The Company.
- k) **Qualitative data** - personal and other information You may provide when entering contests or giveaways and/or responding to surveys. Here is also included Your transaction history, interactions with our services over sites and Your customer experience after becoming our customer.
- l) **Quantitative data** - numerical statistics data related to Your time spent on our site, our pages visited including other pages that led or referred You to our site, links clicked, language preferences and email open rates. It also includes information about Your online activities on websites and connected devices over time and across third-party websites, devices, apps and other online features and services. We use Google Analytics on our Sites to help us analyse Your use of our Sites and diagnose technical issues.
- m) **Service Providers** - any vendor, third party and/or company that provides services or performs business operations on our behalf, such as printing, mailing, and other communications services (email, direct mail, etc.), marketing, data processing and outsourced technology, servicing, collections, ad management, auditors, consultants and professional advisors.
- n) **Services** – means the services provided by The Company to its customers.
- o) **Website** – means The Company website.
- p) **You** – has the meaning of the person whose Personal Data is processed by The Company.

### 3. Data Controller

Cyberstar s.r.o. is the controller and responsible for your personal data (collectively referred as "Company", "We", "Us", "our " in this privacy policy. The Company has appointed a Data Protection Officer (DPO) who is responsible for overseeing any questions in relation to this privacy policy.

**Contact Details of Controller:**

Cyberstar s.r.o., Kodaňská 1441/46, 101 00 Prague, Czech Republic  
ID No.: 07717261  
e-mail: [info@cyberstarpayments.com](mailto:info@cyberstarpayments.com)

If You have any questions about this privacy policy, including requests to exercise your legal rights, please contact the DPO. Please use the below details:

**DPO Contact details:**

KOPEČNÝ & PARTNERS s.r.o., Stará 98/18, 602 00 Brno, Czech Republic, Mgr. Bc. Petra Juřátková, email: [povenerec@kopecnypartners.com](mailto:povenerec@kopecnypartners.com), telephone: +420 778 886 293.



## 4. Data Collected

This privacy statement describes how We (and our Service Providers) collect, use, store, share and keep or protect Your Personal Data. The types of data we collect will depend on which product or service You request or use. We collect **Personal Data** about You from:

- A. the application form for an account and other documents You provide to us;
- B. when You use the “contact us” service and online customer support that our company provides;
- C. when You request or utilise products, goods or services (e.g., use Your account to make transactions with merchants, use your card to make transactions with ATM operators, use concierge services or book travel);
- D. You, through the way You communicate with us and use Your account (e.g., telephone numbers provided during servicing calls);
- E. any research or surveys You enter or respond to or any marketing offers for which You register;

We may collect, use, store and transfer different kinds of personal data about you which we have grouped in the following sections:

**Identity Data** -first name, last name, date of birth, gender, marital status, username (passports, national identity cards, utility bills).

**Contact Data** – billing address, registered address, email address, telephone number.

**Transaction Data** - details about payments to and from you and other details of services and products you received from us.

**Technical Data** – IP address, login data, browser version and type, time zone setting, location, operating system and platform.

**Profile Data** -username, password, purchase or orders made by You, feedback, survey responses.

**Usage Data** – information about how you use website, services, products.

**Marketing and Communications Data** -your preferences in receiving marketing from us and your communication preferences.

We do not collect any **special categories of Personal Data** about you (details about Your race, ethnicity, religious, philosophical beliefs, political opinions, information about health, genetic or biometric data).



## 5. Use of Your Personal Data

Having accurate information about You, permits us to provide You with a smooth, efficient, and customized experience. We use Your **Personal Data**: (i) where it is necessary for the performance of a contract or compliance with a legal obligation (e.g., due diligence financial institutions are required to perform before approving an account); (ii) for our legitimate interests, such as to establish, exercise or defend legal claims, prevent fraud and/or enhance our products or services; or (iii) where we have obtained Your consent, such as for marketing purposes. More specifically, we use Your **Personal Data** to do the following:

- (1) deliver products and services, including to:
  - i. process applications for our products, including making decisions about whether to approve Your application;
  - ii. administer and manage Your account, such as whether to approve individual transactions;
  - iii. communicate with You through email, SMS or any other electronic methods about Your accounts, products, and services and to update You about new features and benefits attached to the products or services that You requested;
  - iv. service and manage any benefits and insurance programmes provided along with the products or services that You requested;
  - v. answer questions submitted to us by You and respond to Your requests;
  - vi. Request feedback and contact You about Your use of the Site.
  
- (2) advertise and market products and services for The Company and our **Business Partners**, including to:
  - i. present content that is personalised in accordance with Your preferences;
  - ii. help determine whether You may be interested in new products or services;
  - iii. deliver targeted advertising, newsletters, and other information regarding the Site updates;
  - iv. communicate promotions and offers to You (by mail, e-mail, telephone, SMS, via the internet or using other electronic means) in relation to products and services that may interest You or which are similar to Your existing The Company products and services;
  
- (3) improve our products and services and conduct research and analysis, including to:
  - i. better understand our customers, their needs, preferences and behaviour;
  - ii. analyse whether our ads, promotions and offers are effective;
  - iii. conduct testing (to ensure security and when we update our systems), data processing, website administration and information technology system support and development;
  - iv. increase the efficiency and operation of the Site and our mobile application.
  - v. allow You to give feedback by rating and reviewing our products and services and those of our **Business Partners**;
  - vi. produce data analytics, statistical research, and reports on an aggregated basis;
  - vii. monitor and/or record Your telephone calls with us or our **Service Providers** to ensure consistent servicing levels (including staff training) and account operations;
  - viii. monitor and analyze usage and trends to improve Your experience of the Site of The Company and Mobile App;
  
- (4) manage fraud, operational and security risks (using automated processes and/or manual



reviews) including to:

- i. review and approve individual transactions including those You make through digital channels;
- ii. safeguard the security of Your Personal Data;
- iii. assist law enforcement;
- iv. prevent fraudulent transactions, monitor against theft and protect against criminal activity;
- v. develop and refine our risk management policies, models and procedures for applications and customer accounts, relying upon information in Your application or relating to Your creditworthiness and account history (if applicable);
- vi. comply with laws and regulations, including to establish, exercise or defend legal claims and assist in dispute resolution;

(5) process Your application (or personalise Your offers) for our products and services (using automated processes and/or manual reviews) including to:

- i. help us better understand Your financial circumstances and behaviour so that we can make decisions about how we manage Your existing accounts and what other products or services can be extended to You;

## 6. Data Sharing

We do not share Your Personal Data with anyone except as described below. We will share Your Personal Data only with Your consent or as required or permitted by applicable law, such as with:

- (1) regulatory authorities, courts, and governmental agencies to comply with legal orders, legal or regulatory requirements, and law enforcement requests;
- (2) our Service Providers, regulatory authorities, law enforcement, governmental agencies and third parties such as Your bank, building society, international auditors or other payment account issuers;
- (3) our Service Providers who perform services for us and help us manage Your account and/or operate our business;
- (4) **Business Partners**, to provide, deliver, offer, customise or develop products and services to You, either jointly or separately. We will not share Your contact information with **Business Partners** for them to independently market their own products or services to You without Your consent. However, we may send You offers on their behalf with Your consent. Please note that if You take advantage of an offer provided by a **Business Partner** and become their customer, they may independently send communications to You. In this case, You will need to review their privacy statement and inform them separately if You wish to decline receiving future communications from them.

## 7. Cookies

A cookie is a piece of data stored on the visitor to a website's hard drive containing information about the visitor that can only be read by the server that placed cookie onto the visitor's hard drive. The Company employs "cookie" technology. The Company website uses cookies to store personal data, to authenticate You as a site user, to track The Company affiliate click-throughs and sign-up rate, and for security purposes.





Most browsers are initially set up to accept cookies. You can set Your browser to block cookies entirely, delete cookies when You leave the website, notify You when You receive a cookie giving You the chance to decide whether or not to accept it, or limit the subsequent retrieval of cookies by the website. In addition, there are number of privacy-enhancing tools and software that You may purchase that will enable You to identify and block cookies on a selective basis. Please note that for some websites that require an authorization, cookies are not optional. Users choosing not to accept cookies will probably not be able to access those websites where cookies are not optional.

To avoid any future persistent cookies being placed onto Your hard drive from The Company Website, You may also "opt out".

The web-site You use tells You how to remove cookies from your browser.

## 8. International Transfer of Data

We process, transfer and access Your **Personal Data** through our systems in the Czech Republic to operate our business, process transactions on foreign purchases, administer Your account or provide products and services to You.

Regardless of where we process Your Personal Data, we will take appropriate steps to ensure the adequate level of protection for Your Personal Data in other countries outside the Czech Republic or EEA including the USA, where data protection laws may not be as comprehensive as the Czech Republic or EEA.

## 9. Security

We use organisational, administrative, technical and physical security measures to safeguard Your **Personal Data** and to help ensure that Your **Personal Data** is processed promptly, accurately and completely. We require Service Providers to safeguard Your **Personal Data** and only use Your **Personal Data** for the purposes we specify.

## 10. Retention of Data

We will keep Your **Personal Data** only as long as we need to deliver the products and services that You requested, unless we are required to keep it for longer periods because of law, regulation, litigation or regulatory investigation purposes. For example, as an Obligated Entity, it's mandatory for us, based on sec. 16 of the act No. 253/2008, the AML Act, to store identification and other data about the Customer, obtained while executing his/her identification, copy of identification documents, data about the person performing Customer identification, time of such identification etc., for a period of 10 years after the execution of transaction or after the termination of relationship. In the event Your account is found in default, and the balance remains unpaid or unsettled, in accordance with fair lending practices, this information could be retained by us for adequate periods of time and considered if You choose to apply for products in the future.



When Your **Personal Data** is no longer necessary for legal or regulatory needs, to administer Your account or to deliver the products and services You have requested, we will take reasonable steps to securely destroy such information or permanently de-identify it.

## 11. Access to Your Personal Data

We encourage You to check regularly that all **Personal Data** held by us is accurate and up to date. If You believe that any information we hold about You is incorrect or incomplete, You may ask us to correct or remove this information from our records.

## 12. Your Rights

You have the right to access, update, erase, change or correct Your **Personal Data**. More specifically, You have the right to:

- (1) withdraw Your consent for our use of Your **Personal Data** at any time, where our processing is based on Your consent;
- (2) request access to Your personal data (a copy of the personal data we have about you);
- (3) request correction of Your personal data;
- (4) request erasure of Your personal data;
- (5) object to processing of Your personal data;
- (6) request restriction of processing Your personal data
- (7) request transfer of Your personal data;
- (8) request a manual review of certain automated processing activities where Your rights are affected.

If You want to exercise any of Your rights or if You have any questions about how we process Your **Personal Data**, You can contact [info@cyberstarpayments.com](mailto:info@cyberstarpayments.com).

## 13. Marketing Choices

You can choose how You would like to receive marketing communications, including direct marketing - whether we send them to You through postal mail, email, SMS and/or telephone. If You wish to opt out of receiving marketing from The Company, we recommend You go to [www.cyberstarpayments.com](http://www.cyberstarpayments.com) log in, and update Your privacy preferences. If You prefer, You can contact the company email [info@cyberstarpayments.com](mailto:info@cyberstarpayments.com). If You choose to not receive marketing communications from us, we will honor Your choice.

Please be aware that if You choose not to receive such communications, certain offers attached to the products or services You have chosen could be affected.

We may contact You to ensure that the information we hold about Your marketing preferences is up to date. Also, we will still communicate with You in connection with servicing Your account, fulfilling Your requests, or administering any promotion or program in which You have elected to participate.



## 14. Query or Complaint

If You have questions about this privacy statement or how Your **Personal Data** is handled or wish to make a complaint or exercise Your rights email at [info@cyberstarpayments.com](mailto:info@cyberstarpayments.com).

