

PRIVACY POLICY OF FINEMONEY

Effective Date: 29.07.2016

Last Amended: 26.07.2016

Limited Liability Company “Fine Finance” (“Company”) takes very seriously the protection of Personal Data of individuals, who are the Users of the Service “Finemoney”, available at <https://fine.money/> (“Service”).

This Privacy Policy (“Policy”) was designed by the Company to inform the Users about personal information of the User that the Company accesses when providing the services through the Service.

This Policy is an annex to and the integral part of the Terms of Use (“Terms”). By accepting the Terms, the User automatically agrees to and accepts the terms of this Policy, as well as gives their consent to the collection, use and disclosure of their Personal Data under the terms provided by this Policy.

DEFINITIONS

Processing of Personal Data – any action and/or set of actions dealing with any collection, registration, accumulation, storage, adaptation, alteration, restoration, usage and disclosure (distribution, sale, transfer), depersonalization, removal of personal data.

Personal Data – any information that allows to identify a person.

User – any legally capable individual who accepted the Terms.

1. PERSONAL DATA COLLECTION

1.1. When using the Service, in order to provide the services, the Company collects the following categories of Personal Data, which are indicated by the User when initiating the payment transfer:

- full name of the User;
- date of birth of the User;
- financial phone number of the User;
- address of residence of the User;
- e-mail address of the User;
- 16-digit number of the User’s Payment card;
- expiration date of the User’s Payment card;
- CVC2/CVV2 code of the User’s Payment card.

1.2. In certain cases, to prevent Fraudulent transactions, the Company may require from the User to provide confirmation of the input data, in particular, copies of a passport or any other document that identifies a person.

1.3. Should the User be identified in the Service in accordance with paragraph 2.6 of the Terms, the Company may access additional Personal Data, including through the social media. Additional Personal Data is transferred to the Company in accordance with this Policy and terms of use of the respective social media.

1.4. The Service may automatically collect some data, including IP-address, time and date of User’s access to the Service. Such information may be Personal Data only if it directly allows to identify the User.

1.5. The User agrees that the term of processing of their Personal Data is at least 10 years. The Personal

Data may be removed after the termination of its storage or in cases provided for by laws of Ukraine.

2. USAGE OF THE INFORMATION

2.1. The Company process the Personal Data by any means for the following purposes:

- provision of services through the Service in accordance with the Terms;
- transfer of information to third parties for the provision of services through the Service in accordance with the Terms;
- evaluation, analysis and improvement of the Company's services;
- facilitation of using the Service.

3. TRANSFER AND DISCLOSURE OF THE INFORMATION

3.1. The Company has a right to transfer the Personal Data, a personal database, which includes the Personal Data, wholly or as partly, to third parties without prior notice to the User, in particular, to:

- persons, who need such information to complete the initiated transfer, in particular, the Acquiring Bank and the Issuing Bank;
- persons responsible for the financial monitoring;
- other persons, if it is required by the Terms or by law.

4. PROTECTION OF THE USERS' INFORMATION

4.1. The Company will use all reasonable measures to protect the Personal Data from unauthorized access, alteration, disclosure or removal. The Service is equipped with the means of security and protection of your Personal Data from its loss, breach, unauthorized access, usage, disclosure, alteration or removal.

4.2. The Company emphasizes that none of the existing ways of data transfer can be absolutely safe. The Company does not guarantee the absolute security of the information and data in case of unauthorized access of the third parties.

5. LIABILITY OF THE COMPANY

5.1. The Company shall be liable for any acts or omissions with regard to the Personal Data in accordance with the current legislation of Ukraine.

5.2. The Company shall not be liable for any illegal actions of third parties, hackers, criminals and other violators, who may violate the Policy and try to seize or seize, wholly or partly, personal information or the Personal Data, and use it for their own purposes.

6. COOKIE POLICY

6.1. The Company has a right to use cookie-files when using the Service.

6.2. The Company may use cookie-files in order to:

- keep track of the User's movements within the Service;
- help the User during using the Service;
- collect information to improve the Service;
- deliver advertising to the User;
- improve the Service.

6.3. The User may block, clear and delete cookies if their web-browser or device allows to do that.

7. AMENDMENTS

7.1. The Company reserves the right to amend this Policy at any time, without prior notice to each User. The Company will publish the date of the last amendments of the Policy in the “Last Amended” Section.

8. CONTACT INFORMATION

8.1. The Users may reach us with any ideas as to improvement of our services, as well as to this Policy, by sending us an electronic letter via email: fine@fine.money.