

Billon Financial Ltd Privacy and Cookies Policy

Billon Financial Ltd is committed to protecting and respecting your privacy.

Billon Financial Ltd and what we do

Billon Financial LTD is a FCA registered Small Electronic Money Institution (reference number 900693). Our main scope of activity concerns e-money issuing and circulation mainly via mass incentive payouts and e-commerce.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our websites and using our application and services you are accepting and consenting to the practices described in this policy.

For the purpose of the European Data Protection Regulations ('GDPR') and the Data Protection Act 2018 (the Act) and, the data controller is Billon Financial Ltd, 1 Fore Street, London EC2Y 9DT.

This Privacy Statement explains how we process your information and your rights under both DPA and GDPR.

Information we may collect from you

We may collect and process the following data about you:

- **Information you give us**
 - In order to register in the Billon application we will ask you for basic information such as email address. To enable you to use the application we may also require your bank details and identity verification information, such as your name and surname, address and date of birth.
- **Information we collect about you**
 - Where appropriate and in accordance with local laws and regulations, we may also collect information about you, for example ID number or relating to directorships and beneficial ownership, to enable us to comply with our anti-money laundering and terrorist financing due diligence obligations.
- **Information we receive from other sources**
 - We may also collect information from third party organisations to enable us to perform checks to prevent and detect crime, to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and for international sanctions.

Cookies

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy below.

Uses made of the information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information mainly to provide you with our e-money issuance and payment services provided through the Billon application and for the day-to-day running of our business.
- **Information we collect about you.** We will use this information to enable us to comply with our anti-money laundering and terrorist financing due diligence obligations.
- **Information we receive from other sources.** We may combine this information 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).

Disclosure of your information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with [them or] you, including without limitation any data processor we engage.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Billon Financial Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

The data that we collect from you are transferred to, and stored at, a destination outside UK but within the European Economic Area ("EEA"). It may also be processed by staff

operating within 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.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at dpo@billonfinancial.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Your rights under Data Protection Law

We operate under the Data Protection Act 2018 ('DPA') and the European General Data Protection Regulation ('GDPR').

The DPA and GDPR apply to 'personal data' we process and the data protection principles set out the main responsibilities we are responsible for.

We must ensure that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner,
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- d) Accurate and where necessary kept up to date,
- e) Kept for no longer than is necessary for the purposes for which the personal data are processed. We operate a data retention policy that ensures we meet this obligation. We only retain personal data for the purposes for which it was collected and for a reasonable period thereafter where there is a legitimate business need or legal obligation to do so. For detail of our current retention policy contact our privacy officer at dpo@billonfinancial.com,

- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We ensure lawful processing of personal data by obtaining consent; or where there is a contractual obligation to do so in providing appropriate products and services; or where processing the data is necessary for the purposes of our legitimate interests in providing appropriate products and services.

In the majority of cases we process personal data based on your contract with us. In other cases, we process personal data only where there are legitimate grounds for so doing.

To meet our Data Protection obligations, we have established comprehensive and proportionate governance measures.

We ensure data protection compliance across the organisation through:

- a) Implementing appropriate technical and organisational measures including internal data protection policies, staff training, internal audits of processing activities, and reviews of internal HR policies;
- b) Maintaining relevant documentation on processing activities;
- c) Implementing measures that meet the principles of data protection by design and data protection by default including data minimisation, pseudonymisation, transparency, deploying the most up-to-date data security protocols and using data protection impact assessments across our organisation and in any third party arrangements.

Under the GDPR You have the following specific rights in respect of the personal data we process:

1. The right to be informed about how we use personal data - This Privacy Statement explains who we are; the purposes for which we process personal data and our legitimate interests in so doing; the categories of data we process; third party disclosures; and details of any transfers of personal data outside the UK.
2. The right of access to the personal data we hold. In most cases this will be free of charge and must be provided within one month of receipt.
3. The right to rectification where data are inaccurate or incomplete. In such cases we shall make any amendments or additions within one month of your request.
4. The right to erasure of personal data, but only in very specific circumstances, typically where the personal data are no longer necessary in relation to the purpose for which it was originally collected or processed; or, in certain cases where we have relied on consent to process the data, when that consent is withdrawn and there is no other legitimate reason for continuing to process that data; or when the individual objects to

the processing and there is no overriding legitimate interest for continuing the processing.

5. The right to restrict processing, for example while we are reviewing the accuracy or completeness of data, or deciding on whether any request for erasure is valid. In such cases we shall continue to store the data, but not further process it until such time as we have resolved the issue
6. The right to data portability which, subject to a number of qualifying conditions, allows individuals to obtain and reuse their personal data for their own purposes across different services
7. The right to object in cases where processing is based on legitimate interests, where our requirement to process the data is overridden by the rights of the individual concerned; or for the purposes of direct marketing (including profiling); or for processing for purposes of scientific / historical research and statistics, unless this is for necessary for the performance of a public interest task
8. Rights in relation to automated decision making and profiling

Please contact our privacy officer at dpo@billonfinancial.com for more information about the GDPR and your rights under Data Protection law.

If you have a complaint about data protection at **Billon Financial Ltd**, please contact our privacy officer at dpo@billonfinancial.com .

Alternatively contact our supervisory authority for data protection compliance:

www.ico.org.uk:

Information Commissioner's Office

Wycliffe House

Water Lane, Wilmslow

Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

About cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Cookies can make the internet more useful by storing information about your preferences on a particular site, such as your personal preference pages.

The use of cookies is an industry standard, and most websites use them to provide useful features for their customers. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. Most browsers are initially set to accept cookies.

If you would prefer, you can set yours to refuse cookies. However, you may not be able to take full advantage of a website if you do so.

Billon uses a number of “cookies” and HTML5 Local Storage files on the website.

"Cookies" and HTML5 Local Storage files are small files of data that reside on your computer and allow us to recognise if you return to this site using the same computer and browser or visit multiple pages in our site during the same session

To turn off cookies and HTML5 Local Storage: browsers allow you to do this by changing your browser settings. Please note that switching off cookies and HTML5 Local Storage may restrict your use of this site.

Currently, we use the following cookies:

| Cookie Description | Purpose |
|---------------------------|------------------------------------------------------------------------------------------|
| YouTube service cookie | Tracking embedded videos watching activities according to YouTube service privacy policy |

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to dpo@billonfinancial.com.

Policy Last updated: **24th May 2018**

For more information please refer to the following websites:

Security information for financial transactions: <http://www.banksafeonline.org.uk>

To learn more about cookies visit: <http://www.allaboutcookies.org/>

Cookies for advertising: <http://www.youronlinechoices.com/uk/>

Learn more about cookies: <http://www.microsoft.com/info/cookies.msp>

Data Protection Act: <http://www.legislation.gov.uk/ukpga/1998/29/contents>

Google analytics privacy policy: <http://www.google.com/intl/en/privacypolicy.html>

UK data privacy guidelines: <http://www.ico.org.uk/>

YouTube privacy policy: https://www.youtube.com/static?template=privacy_guidelines