



GDPR Policy

SMART ENERGY PAY SOLUTION LTD.

1054-7070E Farrel Rd SE, Calgary, T2H0T2, Canada

BRC: 2025762168 | MSB License: C100000081

1. Introduction

SMART ENERGY PAY SOLUTION LTD. ("Company", "we", "us", "our") is committed to protecting your personal data and respecting your privacy in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"). This policy describes how we collect, use, store, and protect personal data when providing services to customers in the European Union.

2. Data Controller

For the purposes of the GDPR, SMART ENERGY PAY SOLUTION LTD. is the data controller of your personal data.

Email: privacy@smartenergypays.io

Address: 1054-7070E Farrel Rd SE, Calgary, T2H0T2, Canada

3. Lawful Basis for Processing

We process personal data on the following legal bases:

- Consent (Article 6(1)(a))
- Contract Performance (Article 6(1)(b))
- Legal Obligations (Article 6(1)(c))
- Legitimate Interests (Article 6(1)(f)) – such as fraud prevention, security, and service improvement



4. Types of Personal Data Collected

We may collect and process the following categories of personal data:

- Identification Data: Full name, date of birth, nationality
- Contact Data: Email, phone number, residential address
- Financial Data: Bank account details, transaction history
- KYC/KYB Data: Official ID documents, proof of address, business documentation
- Technical Data: IP address, browser type, access logs

5. Purpose of Data Collection

Your personal data is processed for the following purposes:

- To conduct identity verification and KYC/KYB checks
- To provide and manage our financial services
- To fulfill anti-money laundering (AML) and legal obligations
- To improve our services and customer experience
- To respond to customer inquiries and support requests
- To prevent fraud and conduct regulatory audits

6. Data Retention

We retain personal data for as long as necessary to fulfill the purposes outlined above, including meeting legal, accounting, and regulatory requirements. Personal data is typically retained as follows:

- KYC/KYB Data: Minimum 5 years after the end of the customer relationship
- Transaction Data: Up to 10 years as per applicable law



7. Data Sharing

We may share your data with:

- Authorities and Regulators (e.g., FINTRAC, MFSA, Tax Authorities)
- Auditors and Compliance Partners
- Financial Institutions and Payment Processors
- Service Providers acting on our behalf (e.g., IT, Cloud Storage, Identity Verification)

All third parties are GDPR-compliant and contractually bound to secure your data.

8. Data Transfers Outside the EU

As our company is based in Canada, your data may be transferred outside the EU. Canada is recognized by the European Commission as having an adequate level of data protection. For transfers to other countries, we ensure appropriate safeguards (e.g., Standard Contractual Clauses).

9. Your GDPR Rights

As a data subject in the EU, you have the following rights:

- Right to Access – Obtain a copy of your personal data
- Right to Rectification – Correct inaccurate or incomplete data
- Right to Erasure – Request deletion of your data (where applicable)
- Right to Restrict Processing – under certain conditions
- Right to Data Portability – Receive your data in a structured format
- Right to Object – to processing based on legitimate interests
- Right to Withdraw Consent – at any time

To exercise these rights, please contact us at privacy@smartenergypays.io.



10. Security Measures

We implement industry-standard technical and organizational measures to secure your personal data, including:

- Data encryption at rest and in transit
- Access controls and authentication
- Regular audits and compliance reviews
- Secure storage of KYC/KYB documentation

11. Automated Decision-Making and Profiling

We do not use automated decision-making or profiling that has legal or significant effects on individuals.

12. Changes to this Policy

This policy may be updated periodically to reflect changes in legal or regulatory obligations. We will notify users of significant changes via email or through our [Privacy Policy](#).

13. Complaints

You have the right to lodge a complaint with your national data protection authority. In the EU, you can find your relevant authority here:

<https://edpb.europa.eu/about-edpb/board/members>