



Privacy Policy

This Privacy Policy applies to personal information that The Company controls, collects, uses or processes only.

Personal Information Protection Principles

Smart Energy Pay Solutions Ltd adheres to the following personal information protection principles:

- Processing of personal information shall be lawful, fair and transparent, and processing activities shall have lawful grounds.
- Personal information may only be collected for specific, transparent and objective purposes and processing activities must fit the purpose for which the personal information was collected.
- The processed personal information must be relevant, adequate and may not include more than what is required for the purpose of the processing.
- Personal information must be kept updated and must be controlled for error to prevent the processing of false and misleading data/information.
- Personal information may only be processed for as long as it is required for the object of the collection.
- Personal information must be secured from unlawful use, loss, unintended deletion and harm.
- Personal information is only processed with the consent of the data subject and ONLY for a permissible purpose such as fraud prevention, identity verification, or similar.



Personal Information User's Rights

A user has the following rights in regards to personal information:

- Right to know whether user's personal information is being processed.
- Right to know how user's personal information is processed.
- Right to request rectification or erasure of user's personal information that is inaccurate or incomplete.
- Right to erasure, meaning user requesting for user's personal information to be erased from The Company's records if there are no legitimate grounds for retaining it.
- Right to object to processing, meaning in certain cases user's right to object to processing of user's personal information, for example in the case of direct marketing.
- Right to restrict processing of user's personal information, e.g. if personal information is inaccurate or the processing is unlawful.
- Right to access the personal information collected from/about the user, including the right to request and obtain a copy of the personal information.
- Right to lodge a complaint, meaning if a user is not satisfied with the way The Company handles user's personal information the right to file a complaint with a supervisory authority.
- Right to withdraw any given consent of processing of user's personal information.



Personal Information Collected

The Company collects and processes Personal Information through several channels, including:

- Online subscription forms
- Conference or event registration
- Telephone and emails
- Company website(s)
- Company app(s)
- Use of the Company website

Data The Company typically collects and processes may include but are not limited to:

- Name
- Email address
- Phone number
- Job title
- Organization or company of employment
- Physical address
- IP Address
- Device ID
- Cryptocurrency wallet address(es)
- Identity documents including drivers license, passport, and proof of address
- Corporate entity information including certificates of incorporation
- Payment instrument information including bank account numbers, bank statements, credit card numbers, payment voucher numbers



Processing of Personal Information

Personal information is only used for the purpose detailed in this Privacy Policy. Personal information is never disclosed, sold or shared without the user's explicit, informed consent, unless required by law.

Personal information is generally used to identify the user, to prevent fraud, and to satisfy our obligations under the Proceeds of Crime, Money Laundering, and Terrorist Financing Act as a Money Services Business.

The Company processes personal information for the following purposes:

- To identify users
- To provide user a service
- To communicate and interact with user
- To improve and promote The Company corporate events
- To conduct questionnaires concerning satisfaction
- To manage risks and prevent fraud
- To comply with anti-money laundering and counter terrorist financing obligations

With user's consent, The Company processes user's personal information to send user newsletters and campaigns and for other specific purposes the user has given consent to.

Personal information is kept until it is no longer required for these purposes and for other purposes deriving from law. Typically, user information is retained for a minimum of 7 years after the time of transaction or cessation of a business relationship. Users may withdraw consent at any time however where The Company has obligations to retain personal information to comply with anti-money laundering legislation requests for redaction may not be honored.



Securing of Personal Information

The Company has taken technical and organizational measures to mitigate risks that personal information will be subject to deletion, publication, alteration, misuse, or to fall in the hands of an unlawful party as part of its Internal Security Policy. A multi-layered security approach is in place, including physical security, access controls, IT security and use of safety protocols.

Any privacy breach where personal information has unintentionally been deleted, altered or made accessible to an unlawful party, The Company will proceed according to its Internal Security Policy. Such Internal Security Policy includes The Company employees' awareness of the procedures they must follow to identify and report any suspected or actual privacy breach.

Transferring of Personal Information

Personal information collected and processed by The Company is never sold to third-party vendors under any circumstance. If compelled by a subpoena, production order, or similar regulatory order The Company will provide information requested directly to law enforcement or the regulatory agency in question. The Company complies with all valid requests for information from law enforcement and regulatory agencies.

Information about Cookies

The Company uses cookies and/or similar technologies to analyse user behaviour, administer its website and to collect information about users. This is done to personalise and enhance the The Company website and app user experience. Cookies store information to help make the website function. Only The Company can access the cookies created by its website.



The Company may use cookies for the following purposes:

- To identify users Functionality cookies are used to store user's preferences such as default language.
- Analytics cookies are used to track the use and performance of the The Company website and services.
- Advertising cookies may be used to deliver advertisements that are relevant to user and to user's interests.

The Company reserves the right to revise its Privacy Policy and make changes to it at any time.