## **Privacy Policy**

updated: 26th August 2025

(introduction)

**Europoint Global s.r.o.**, ("CryptoniusPay"/ "we",/ "our", /"us") is a private limited liability company registered in Czech Republic under a number 404832.

**CryptoniusPay** is committed to respecting your privacy and any information that may disclose your identity ("Personal Data"). This Privacy Policy ("Policy") describes our policies regarding the collection, usage, protection and processing of personally identifiable information received from Users ("User", "You").

We do not collect any information that may identify You without your permission. However, by using our services, you give us a consent and permission to collect, store and use the information about you, including your personal information, as prescribed by this Policy.

This privacy policy aims to inform you about how and why we collect, use, disclose, store and protect your Personal Data in connection with your use of our website, and any of our related services.

Please note that you do not have to transfer your information to us; however, if you do not, it will substantially limit your ability to use and enjoy our products and services.

**CRYPTONIUSPAY Information:** 

CRYPTONIUSPAY is an authorized payment institution established under the Laws of Czech Republic.

Registration number: 404832

Office address: Wolf 532.8, Zizkov, 130 00 Praha 3

Website: <a href="https://cryptonius.io/">https://cryptonius.io/</a>

E-mail: admin@cryptonius.io

Our website may, from time to time, contain links to and from the websites or other links or mobile apps of our partner networks and our affiliates. If you follow one of these links, please note that these links and destinations 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 of your information via these links or destinations.

Collection of Information

CRYPTONIUSPAY gathers various types of information, including information that identifies or may identify you ("Personal Data"). We collect and use information that you voluntarily provide through our website, when you contact us, if you apply for employment with us, or if you use a service that integrates with us.

We also collect and use information about you that is provided by third parties.

We may collect the information provided or generated whenever the User takes any action in our Wallet/website or omits to do it or otherwise uses Our services, such as without limitation:

• When an individual registers for an account with us, we will request information which includes the individual's name, email address, physical address, country of residence, contact phone numbers, date of birth, tax identification number, employment information, and we may request bank account details and credit and/or debit card details;

- Information about yourself, which You may provide to Us, including, but not limited to the name, email address, mailing address, phone number, alias and password used by you as an identifier of your account, that allow us to designate the specific service to you and provide you with the exclusive access to your funds.;
- IP address;
- The type (including identifiers) of the device of the mobile devices You use with the Wallet,
  platform type, geolocation information, internet service, operating system, etc. to provide the
  best service and identify possible issues with particular type of device or operating system or
  language;
- Throughout our relationship with a customer, we may require a customer to provide additional
  information to verify an individual's identity, address or other data to manage our risk and
  compliance functions and to adhere to applicable laws and regulations. We may also obtain
  information about individuals from third parties such as fraud prevention agencies and KYC
  (Know Your Customer) and AML (Anti Money Laundering) service providers to fulfil our legal
  obligations;
- If you choose to participate in a customer survey, we may ask for your name, email address and other information required by the particular survey;
- If you report a problem or submit a customer review, we may ask you to provide information such as your name, email address, and account number;

## Use of Information

CRYPTONIUSPAY will use Personal Data in order to carry out our operation as a payment service provider, to conduct certain activities related to your use of our website, and to better service any account a customer maintains with us.

### This may include:

- To enhance account administration, including following customer instructions, facilitating payments and transactions, and verifying or reconfirming the accuracy of information;
- To assist in providing other services or products requested by a customer;
- To ensure that we comply with all applicable laws and regulations, including tax, legal, reporting, and auditing obligations;
- To help detect, prevent and report potentially fraudulent, prohibited or illegal activities;
- To maintain our relationship and to comply with our obligations with our partners in order to maintain, operate, and administer our memberships with co-branded prepaid debit card programs;
- To ensure our website, our mobile app, content and services are as relevant and effective as
  possible, and to provide the best possible service and experience to our customers;

### Legal framework for Processing Personal Data

Cryptoniuspay will only collect, process, or transfer your Personal Data for any of the following reasons:

Execution of a contract
 To enter into and fulfil a contract we have with you, including providing our services, sending you

messages about your account and our services, answering your inquiries, and investigating and resolving any complaints.

- Compliance with a legal obligation
   To comply with all legal obligations and regulations that apply to us and our customers, including record retention, customer identity confirmation, AML/BSA compliance, fraud prevention, tax reporting, fraud prevention, banking and financial institution laws and regulations, and the like.
- Consent collection

Share and Disclosure Information to Third Parties

Cryptoniuspay may share and disclose Personal Data under the following limited circumstances:

- With business agents/affiliates/partners (including member banks and other financial institution partners) that perform services on our behalf, provide co-branded services or assist in the provision of our services, including those that assist us in preparing and distributing prepaid cardholder communications and responding to cardholder inquiries.
- With third parties to provide statistical tracking and advertising effectiveness for our website and mobile app. These third parties are prohibited from using Personal Data for any other purpose.
- When required by law and/or government authorities

Your Rights and Controlling Your Personal Information

**Your choice:** By providing personal information to us, you understand we will collect, hold, use, and disclose your personal information in accordance with this privacy policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of our website or the products and/or services offered on or through it.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Marketing permission:** If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

**Complaints:** If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

**Unsubscribe:** To unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details provided in this privacy policy, or opt-out using the opt-out facilities provided in the communication. We may need to request specific information from you to help us confirm your identity.

You have the following rights with regard to your Personal Data at Cryptoniuspay:

 Right of access
 You have the right of access, commonly referred to as subject access, which gives you the right to obtain a copy of your Personal Data and supplementary information. • Right to withdraw consent
In the event that you've provided your consent to process your Personal Data, you have the right to withdraw that consent. To opt out of marketing, please send an email to <a href="mailto:admin@cryptonius.io">admin@cryptonius.io</a>

## • Right to rectification

We want to ensure that your Personal Data is accurate and up to date. If any of the information that you have provided to us changes (for example, if you change your email address or phone number), please provide the updated information by sending an email to <a href="mailto:admin@cryptonius.io">admin@cryptonius.io</a> You may ask us, or we may ask you, to correct information that you or we think is inaccurate, and you may also request that we delete information which is inaccurate.

# Right to erasure ("right to be forgotten") You can request us to erase your Personal Data where there is no compelling reason to continue processing. This right only applies in certain circumstances; it is not a guaranteed or absolute right, and is subject to record retention laws and regulations that may prohibit us from complying with your request until a later date.

# Right to data portability You have the right to obtain your Personal Data that you have provided to us with your consent or which was necessary for us to provide you with our products and services in a format which enables you to transfer that Personal Data to another organization. You also have the right to have your Personal Data transferred by us directly to the other organization, if this is technically

- Right to object and automated individual decision-making
   You have the right not to be subject to a Cryptoniuspay decision based solely on automated processing (without human involvement) where that decision produces a legal result or otherwise significantly affects you. You can request that a Cryptoniuspay employee or representatives participate in any such decision-making process.
- Right to complain to a supervisory authority
   You have the right to the right to lodge a complaint with a regulatory supervisory authority.

## **Data Retention**

feasible.

Cryptoniuspay is an authorized payment institution established under the Laws of Czech Republic and is required by Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) laws, including the Fifth Money Laundering Directive (EU) 2018/843 (5MLD) to retain some of your Personal Data, including transactional data, for up to 5 years.

We may also retain Personal Data, as necessary, for the duration of our relevant relationship or activity with you. We may also retain Personal Data longer for legitimate reasons that include anti-money laundering or fraud monitoring and compliance, to defend against ongoing or potential legal claims, to analyze historical recordkeeping, or to comply with legal and regulatory obligations.

Please note, retention periods are subject to change, depending on where you live, and changes to legal and regulatory requirements.

### **International Data Transfers**

Cryptoniuspay may utilize external vendors in countries located both within the European Economic Area ("EEA") and outside the European Economic Area ("EEA"), to which we may transfer Personal Data from our offices in the European Economic Area ("EEA"). We have signed vendor data protection agreements with each vendor to ensure that they are contractually obligated to treat your Personal Data with the

same privacy principles that we at Cryptoniuspay uphold and in the same manner as detailed throughout this Privacy Notice.

If these vendors are not located in the EEA, then we ensure standard contractual clauses are in place to guarantee the adequacy of cross-border transfers from our office in the EEA.

### Security

We use technical, organizational and administrative security measures to protect any Personal Data we hold, transmit, store or otherwise process from accidental or unlawful destruction, loss or alteration, or unauthorized disclosure or access.

### Children

We do not knowingly collect or solicit Personal Data from anyone under the age of 18.

Cookies and Other Tracking Technologies

We use cookies and other tracking technologies for the following purposes:

- To help us and third parties obtain information about your visits to our website
- To analyze your visiting patterns to improve our website
- To deliver advertising, communications and content that are specific to your interests from Cryptoniuspay and third parties on our website and third-party websites
- To remember your language and other preferences
- To help you obtain information
- To measure how many people use our website and how they use it

Our website is regularly scanned to maintain a list of cookies that is as accurate as possible. We classify cookies in the following categories:

- Strictly necessary cookies
- Performance cookies
- Functional cookies
- Targeting cookies

## Terms of Service

You may review our Terms of Service at our website.

# Changes to This Policy

At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes here at the same link by which you are accessing this privacy policy.

If the changes are significant, or if required by applicable law, we will contact you (based on your selected preferences for communications from us) and all our registered users with the new details and links to the updated or changed policy.

If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.

We recognize that data protection and data privacy is an ongoing responsibility, so we will update this Privacy Notice from time to time as we implement new practices or adopt new privacy policies. You are responsible for periodically reviewing this Privacy Notice.

# **Contact Us**

For any questions or concerns regarding your privacy, you may contact us using the following details:

Office address: Wolf 532.8, Zizkov, 130 00 Praha 3.

Website: <a href="https://cryptonius.io/">https://cryptonius.io/</a>

E-mail: admin@cryptonius.io