



Customer Privacy Policy for Personal Account Users in EEA

Effective 20 August 2024



CUSTOMER PRIVACY POLICY

Effective date 20 August 2024

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We're committed to protecting and respecting your privacy.

We will:

- always keep your personal data safe and private
- never sell your personal data
- allow you to manage and review your marketing choices at any time.

1. GENERAL INFORMATION

The GBHF Company providing you with a product or service under the trade name of *Global Ukraine* will be responsible for processing your personal data for that product or service. The GBHF company is known as the 'controller' of your personal data.

This Privacy Policy has been developed for purposes of compliance with the General Data Protection Regulations 2017 ("GDPR") and shall serve as part of your initial customer relationship with us and our ongoing commitments to you.

In this Privacy Policy, our GBHF Company (hereinafter: "**Company**", "**Global Ukraine App**", "**we**", "**our**") shall inform you about the collection, use and processing of personal data when using our website <https://global-ukraine.gbhs.fr/en/fintech-global-ukraine-card> (hereinafter: "**Website**") and our mobile app (hereinafter: "**App**"; jointly called: "**Services**").

We will explicitly point out in case any information of this Privacy Policy refers exclusively to our Website or App. For information related to the usage of cookies or similar technologies on our Website or Apps, please refer to the respective website and app cookie policies in the legal documents section of your app or on our websites.

In this context, personal data means all detailed information about personal or factual circumstances of a specific or identifiable natural person, such as name, telephone number or address. We process your personal data either within our business relation if you are a Global Ukraine App customer or when you are visiting our website for informative purposes.

Furthermore, we process personal data coming from publicly accessible sources (e.g. records of debtors, trade registers, registers of associations, media, press, internet) whenever we have a legal ground that allows us to do so.

When using additional Global Ukraine App products or products of our business partners additional personal data might be collected, processed and stored. Please find details concerning the processing of additional data in the respective product category below.

This notice explains what information we collect, how we use it, and your rights over your personal data, and

- give you more detail about how the Company collects, uses and protects your personal data when you use our specific products or services;
- will be provided to you through our app when you start using our relevant products or services;
- can be accessed at any time through our website (<https://global-ukraine.gbhs.fr/en>).

Sometimes, we may also provide you with 'just in time' privacy explanations in the Global Ukraine app. When you use a new product or service for the first time:

- these explanations will help you to understand what specific personal data the Company collects, uses or shares about you for that product or service;
- where relevant, you will be prompted to review your in-app privacy preferences.

We may provide privacy notices and explanations in languages other than English. If there are any discrepancies between other language versions and the English language version, the English language version is authoritative. If you have concerns about how we use your personal data, you can contact office@global-ukraine.org.

2. WHAT PERSONAL DATA WE COLLECT?

The table below explains what personal data we collect and use.

Type of personal data	Details
Information you give us	<p>We collect information you provide when you:</p> <ul style="list-style-type: none"> • fill in any forms • correspond with us • respond to any of our surveys • register to use the Global Ukraine App • open an account or use any of our services • give us access to your other financial accounts (for example, through Open Banking) • take part in online discussions or promotions • speak with a member of our social media or customer support teams (through our help desk or through the Global Ukraine App) • enter a competition or share information with us on social media • contact us for other reasons <p>We will collect the following information:</p> <ul style="list-style-type: none"> • your name, address, and date of birth • your email address, phone number and details of the device you use (for example, your phone, computer or tablet) • your Global Ukraine App referral code • your registration information • details of your bank account, including the account number and IBAN • details of your Global Ukraine App debit cards (or other debit or credit cards you have registered with us) including the card number, expiry date and CVC (the last three digits of the number on the back of the card) • copies of your identification documents (for example, your passport or driving license) and any other information you provide to prove you are eligible to use our services • your country of residence, tax residency information, and tax identification number • information you provide when you apply for opening account, including details about your income and financial revenues • records of our discussions, if you contact us or we contact you (including records of phone calls) • your image in photo or video form, and facial scan data extracted from your photo or video (known as 'biometric data'), to verify your identity during onboarding as part of our Know-Your-Customer (KYC) checks, to authenticate you as an authorized user of our services, or to detect and prevent fraud • information about other people (such as a joint account holder, your spouse or family) when we ask you to give us this information to enable us to comply with our obligations under KYC, anti-money laundering and other laws and to assist with fraud monitoring • If you give us personal data about other people (such as a joint account

	holder, your spouse or family), or you ask us to share their personal data with third parties, you confirm that you have brought this notice to their attention beforehand.
Information collected from your use of our products and services	<p>Whenever you use our website or the Global Ukraine App, we collect the following information:</p> <ul style="list-style-type: none"> • technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, the browser type and version, the time zone setting, device language, the operating system and platform, the type of device you use, whether your device uses a virtual private network (VPN), a unique device identifier (for example, your device's IMEI number, or the mobile phone number used by the device), mobile network information, your mobile operating system and the type of mobile browser you use • information about your visit, including the links you've clicked on, through and from our website or app (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page • information on transactions and your use of Global Ukraine App products (for example, payments into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction (including merchants' and ATMs' locations), IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received, details of device used to arrange the payment and the payment method used • information stored on your device, including if you give us access to contact information from your contacts list. The Global Ukraine App will regularly collect this information to stay up to date (but only if you have given us permission)
Information about your location	If you turn location services on in the Global Ukraine app, we track your location using GPS technology.
Information from others	<p>We collect personal data from third parties or other people, such as credit reference agencies, financial or credit institutions, official registers and databases, as well as joint account holders, fraud prevention agencies and partners who help us to provide our services.</p> <p>Sometimes other Global Ukraine customers may give us information about you. For example, a Global Ukraine customer may tell us that you have behaved inappropriately and provide us with evidence to support their claim.</p>
Information from social media	Occasionally, we'll use publicly available information about you from selected social media websites or apps to carry out enhanced due diligence checks. Publicly available information from social media websites or apps may also be provided to us when we conduct general searches on you (for example, to comply with our anti-money laundering or sanctions screening obligations).
Information from publicly available sources	We collect information and contact details from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches, and KYC purposes.

3. USE OF PERSONAL DATA

We must have a legal basis (a valid legal reason) for using your personal data. Our legal basis will be one of the following:

Keeping to our contracts and agreements with you

We need certain personal data to provide our services and cannot provide them without this personal data.

Legal obligations

In some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

Legitimate interests

We sometimes collect and use your personal data because we have a legitimate reason to use it and this is reasonable when balanced against your human rights and freedoms.

Substantial public interest

Where we process your personal data, or your sensitive personal data (sometimes known as special category personal data), to adhere to government regulations or guidance, such as our obligation to prevent fraud or support you if you are or become a vulnerable customer.

Consent

Where you've agreed to us collecting your personal data, or sensitive personal data, for example when you tick a box to indicate you're happy for us to use your personal data in a certain way.

We explain more about the ways in which we may use your personal data using following table.

What we use your personal data for	Our legal basis for using your personal data
<p>Checking your identity</p> <p>Whenever you sign up with Global Ukraine, we'll use your personal data to check your identity or the identity of joint account holders (as part of our KYC process).</p> <p>This may include facial scan data extracted from any photo or video you submit (known as 'biometric data').</p>	<ul style="list-style-type: none"> • Legal obligations • Substantial public interest • Consent (where required by law)
<p>Providing our services</p> <p>Whenever you sign up with Global Ukraine App, apply for or use a product or service, we'll use your personal data to:</p> <ul style="list-style-type: none"> - check your identity, and the identity of joint account holders (as part of our KYC process); - decide whether or not to approve your application; - meet our contractual and legal obligations relating to any products or services you use (for example, making payments into and out of your Global Ukraine account, withdrawing cash or making payments with your Global Ukraine card); 	<ul style="list-style-type: none"> • Keeping to contracts and agreements between you and us; • Legitimate interests (we need to be efficient about how we meet our obligations, and we want to provide you with good products and services); • Legal obligations.

<ul style="list-style-type: none"> - help you understand your spending behavior, how you use Global Ukraine products and services, and to help you save money (for example, by providing you with product usage and spending insights) - recover debt and exercise other rights we have under any agreement with you - provide you with customer support services. We may record and monitor any communications between you and us, including phone calls, to maintain appropriate records, check your instructions, analyze, assess and improve our services, and for training and quality control purposes. 	
<p>Protecting against fraud</p> <p>We use your personal data to check your identity to protect against fraud, keep to financial crime laws and to confirm that you're eligible to use our services. We also use it to help us better understand your financial circumstances and manage fraud risks related to your Global Ukraine account.</p>	<ul style="list-style-type: none"> • Legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities); • Legal obligations.
<p>Marketing and providing products and services that might interest you</p> <p>We use your personal data to do the following:</p> <ul style="list-style-type: none"> - to personalize your in-app experience and marketing messages about our products and services so they're more relevant and interesting to you (where allowed by law). This may include analyzing how you use our products, services and your transactions; - if you agree, provide you with information about our partners' promotions or offers which we think you might be interested in; - if you agree, allow our partners and other organizations to provide you with information about their products or services; - measure or understand the effectiveness of our marketing and advertising, and provide relevant advertising to you; - ask your opinion about our products or services. 	<ul style="list-style-type: none"> • Legitimate interests (to send direct marketing, ensure our direct marketing is relevant to your interests, develop our products and services, and to be efficient about how we meet our legal and contractual duties); • Consent (where we're legally required to get your consent to send you direct marketing about our products or services, or partners' promotions or offers, or for you to receive marketing from other organizations).

<p>To keep our services up and running</p> <p>We use your personal data to manage our website and the Global Ukraine App, (including troubleshooting, data analysis, testing, research, statistical and survey purposes), and to make sure that content is presented in the most effective way for you and your device.</p> <p>We also use your personal data to:</p> <ul style="list-style-type: none"> - verify your identity if you contact our customer support or social media teams; - allow you to take part in interactive features of our services; - tell you about changes to our services; - help keep our website and the Global Ukraine App safe and secure. 	<ul style="list-style-type: none"> • Keeping to contracts and agreements between you and us; • Legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply to us and to present content as effectively as possible for you); • Consent (where required by law).
<p>Helping with social interactions</p> <p>We use your personal data to help with social interactions through our services, or to add extra functions in order to provide a better experience. For example, if you give us permission, we'll use the contacts list on your phone so you can easily make payments to, or message your contacts using the Global Ukraine App.</p>	<ul style="list-style-type: none"> • Legitimate interests (to develop our products and services and to be efficient in meeting our obligations) • Consent (to access information held on your phone, for example, contacts in your contacts list, to track you when you have location services switched on)
<p>Providing location-based services</p> <p>If you turn location services on in the Global Ukraine App, we use your personal data to:</p> <ul style="list-style-type: none"> - provide you with products and services; - provide relevant advertising to you (for example, information about nearby merchants); - protect against fraud. 	<ul style="list-style-type: none"> • Keeping to contracts and agreements between you and us • Legitimate interests (to develop and market our products and keep to regulations that apply to us) • Consent (to track you when you have location services switched on)
<p>Preparing anonymous statistical datasets</p> <p>We prepare anonymous statistical datasets about our customers' spending patterns:</p> <ul style="list-style-type: none"> • for forecasting purposes • to understand how customers use Global Ukraine • to comply with governmental requirements and requests. <p>These datasets may be shared internally or externally with others, including non- Global Ukraine companies. We produce these reports using information about you and other customers. The information used and shared in this way is never</p>	<ul style="list-style-type: none"> • Legitimate interests (to conduct research and analysis, including to produce statistical research and reports) • Legal obligations

<p>personal data and you will never be identifiable from it. Anonymous statistical data cannot be linked back to you as an individual.</p> <p>For example, some countries have laws that require us to report spending statistics and how money enters or leaves each country. We'll provide anonymized statistical information that explains the broad categories of merchants that Global Ukraine customers in that country spend their money with.</p> <p>We'll also provide information about how Global Ukraine customers top up their accounts and transfer money.</p> <p>However, we won't provide any customer-level information. It will not be possible to identify any individual Global Ukraine customer.</p>	
<p>Improving our products and services</p> <p>We use your personal data to help us develop and improve our current products and services. This allows us to continue to provide products and services that our customers want to use.</p>	<ul style="list-style-type: none"> • Legitimate interests (to understand how customers use our products so we can develop new products and improve the products we currently provide)
<p>Meeting our legal obligations, enforcing our rights and other legal uses</p> <p>We use your personal data:</p> <ul style="list-style-type: none"> - to share it with other organizations (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies) - to recover debts from you (for example, where you have a negative balance in your account) - if this is necessary to meet our legal or regulatory obligations; - in connection with legal claims; to help detect or prevent crime. 	<ul style="list-style-type: none"> • Legitimate interests (for example, to protect Global Ukraine App during a legal dispute) • Substantial public interest (if we process your sensitive personal data to keep to legal requirements that apply to us) • Legal obligations

4. CUSTOMER RIGHTS

Your right	What it means
You have the right to be told how we use your personal data	We provide this privacy notice to explain how we use your personal data.
You have the right to ask us for a copy of your personal data	If you ask, we'll provide a copy of the personal data we hold about you. We can't give you any personal data about other people, personal data which is linked to an ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we've had with our legal advisers.
You can ask us to correct your personal data if you think it's wrong	You can have incomplete or inaccurate personal data corrected. Before we update your file, we may need to check the accuracy of the new personal data you have provided.
You can ask us to delete your personal data	<p>You can ask us to delete your personal data if:</p> <ul style="list-style-type: none"> • there's no good reason for us to continue using it • you gave us consent (permission) to use your personal data and you have now withdrawn that consent • you have objected to us using your personal data • we have used your personal data unlawfully • the law requires us to delete your personal data <p>Just to let you know, we may not be able to agree to your request. As a regulated financial services provider, we must keep certain customer personal data even when you ask us to delete it (we've explained this in more detail below).</p> <p>If you've closed your Global Ukraine account, we may not be able to delete your entire file because these regulatory responsibilities take priority. We'll always let you know if we can't delete your personal data.</p>
You can object to us processing your personal data for marketing purposes	You can tell us to stop using your personal data, including profiling you, for marketing.
You can object to us processing other personal data (if we're using it for legitimate interests)	If our legal basis for using your personal data is 'legitimate interests' and you disagree with us using it, you can object. However, if there is an overriding reason why we need to use your personal data, we will not accept your request. If you object to us using personal data which we need to provide our services, we may need to close your account as we won't be able to provide the services.
You can ask us to restrict how we use your personal data	<p>You can ask us to suspend using your personal data if:</p> <ul style="list-style-type: none"> • you want us to investigate whether it's accurate • we no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim • you have objected to us using your personal data (see above), but we need to check whether we have an overriding reason to use it
You can ask us to transfer personal data to you or another company	If we can, and are allowed to do so under regulatory requirements, we'll provide your personal data in a structured, commonly used, machine-readable format.
You can withdraw your permission	If you've given us the consent we need to use your personal data, you can withdraw it at any time by changing your privacy settings in the Global Ukraine app or sending an email office@global-ukraine.org .

<p>You can ask us to carry out a human review of an automated decision we make about you</p>	<p>If we make an automated decision about you that significantly affects you, you can ask us to carry out a manual review of this decision.</p>
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Your ability to exercise these rights will depend on a number of factors. Sometimes, we won't be able to agree to your request (for example, if we have a legitimate reason for not doing so or the right does not apply to the particular information we hold about you).

To help protect the Global Ukraine system and to assist you in filing your tax returns, we also share your tax information number and the description of your sub accounts with the Tax Authorities.

We process and store your data as long as you remain a Global Ukraine App user. We only keep your data for the time necessary to fulfil the purpose of collection. You may request us to close your account at any time and delete your data after account closure. We may retain certain data after account closure due to legal or regulatory requirements. We are legally obliged to retain certain data for a minimum of 5 to 7 years after ending the customer relationship and in other cases up to 10 years, as in the case of accounting obligations.

We are able to store personal data for longer periods with a valid legal ground, or when the data is sufficiently pseudonymized or anonymized.

5. OTHER SECURITY MEASURES

We recognize the importance of protecting and managing your personal data. Any personal data we process will be treated with the utmost care and security. This section sets out some of the security measures we have in place.

We use a variety of physical and technical measures to:

- keep your personal data safe
- prevent unauthorized access to your personal data
- make sure your personal data is not improperly used or disclosed.

Electronic data and databases are stored on secure computer systems with control over access to information using both physical and electronic means. Our staff receives data protection and information security training. We have detailed security and data protection policies which staff are required to follow when they handle your personal data.

If you use a password for the Global Ukraine App you will need to keep this password confidential. Please do not share it with anyone.

We are always improving and expanding our products and services. This might cause our data processing to change. When we change something, we will adjust our Privacy & Cookies Statements accordingly. You can always find the latest version on our website and in the app.

If you would like more information, please contact us by sending an email to office@global-ukraine.org.