

CL

RIGHT TO INFORMATION/NOTICE AT COLLECTION¹

Controller/Business: Baanx Group, Ltd (abv. “Baanx”), based on Level 18, 40 Bank Street, Canary Wharf, London E14 5NR

E-mail: support@cl-cards.com

Data Protection Officer: dpo@baanx.com

Processing:

Data will be processed by Baanx, as controller/business, for the purposes of creating an account and being registered as a user in Ledger iFrame and the CL app, as well as sending communications about bonus and promotions, according to Global Data Protection Regulation (GDPR) and California Consumer Privacy Act (CCPA) (for California residents).

Lawfulness of processing:

- Processing is necessary for the performance of a contract to which the data subject is party, namely sending communications regarding the product and service (Baanx app and CL Card), according to **point (b) of article 6 (1) GDPR and ‘UK GDPR’**;
- Processing is necessary for compliance with a legal obligation to which the controller is subject, according to **point (c) of article 6 (1) GDPR and ‘UK GDPR’**, specifically The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015.
- The data subject’s consent to the processing of his personal data for the purposes of marketing and newsletters, according to **point (a) of article 6 (1) GDPR and ‘UK GDPR’**.

¹ including for US - California Residents (under CCPA)

Data Communication to Third Parties:

Your data will be shared with Ledger, as our partner and processor/service provider, which will send the communications related to this particular service on our behalf.

Data Retention:

a) Baanx will retain data for a period of 5 years after the end of the business relationship or after the date of an occasional transaction, according to **article 40** of The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015;

b) Baanx will retain data (e-mail address and phone number) for marketing purposes for a period of 2 years after user's last access to his account. If the user intends to delete his account or in case of an exclusion of his account, marketing communications will be canceled.

Automated decisions and Profiling:

In the onboarding process, when the user signs up, automated screenings, including ID verification, will be undertaken as part of customer's due diligence and enhanced due diligence procedures, according to The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015, which can implicate the acceptance or the rejection of the user's application. Due to legal obligations, to comply with Anti-Money Laundering and Counter-Terrorism Financing rules, Baanx will use automated systems to perform user's screening and transaction monitoring. However, we emphasize that all final decisions on procedures will have human intervention.

Data Subject Rights:

The Data Subject/Consumer can request the **access** to his personal data, as well as its **rectification** or **erasure**, the right to **restriction of processing**

and the right to **data portability** (except if any of the restrictions predicted on GDPR be applicable);

The Data Subject/Consumer can **withdraw his consent**, at any moment, without interfering on the data processing, on marketing communications;

The Data Subject/Consumer possesses the right to **lodge a complaint** with a supervisory authority.

The Consumer have a right not to receive discriminatory treatment for exercising his CCPA rights.

To find out more about our Global Data Privacy Policy, please check on our website.