



## PERSONAL DATA PRIVACY POLICY

### I. INTRODUCTION

Iris Solutions OOD, UIC 204997709 (hereinafter referred to as "Iris", "the Company" or "we") is a company licensed to provide payment services as per Bulgarian National Bank - Decision № 316 / 17.09.2019;

This Personal Data Privacy Policy (hereinafter referred to as the "**Privacy Policy**") has been prepared and is based on the current Bulgarian and European legislation regarding personal data protection.

This Privacy Policy regulates the processing of personal data of users on our website [www.irisbgsf.com](http://www.irisbgsf.com), as well as the Iris Multibank Wallet mobile application.

Personal data means any information relating to an identified or identifiable individual. This may be information such as your name, address, email address and other personal information.

This Privacy Policy sets out the rules that Iris follows when processing personal data collected from users. Relevant specific policies apply when providing personal data with a view to employment opportunities.

This Privacy Policy does not affect, restrict or revoke your rights arising from the Personal Data Protection Act ("PDPA") or other relevant legislation.

Please read carefully this Privacy Policy before using the Site and the Apps or providing your Personal Data, whether electronically or on paper, as by providing your Personal Data, you agree to its terms. If you wish that we do not to process your personal data in the manner described in this Privacy Policy, please do not provide personal data. The provision of personal data by you is voluntary, in order to use the functionalities of the Apps and the Site and / or have access to them. Please note that in certain cases, your consent to the processing of personal data may not be required, as Iris has a relevant legal ground to use the data, such as fulfillment of legal obligations under applicable law.

The Company is committed to high standards of information security, confidentiality and transparency and will comply with the General Data Protection Regulation (GDPR).

This Privacy Policy provides you with information about how Iris processes personal data. This includes personal data we will collect about you when you use the Site and Apps or when you use or are a recipient of our services, as well as information we obtain from other sources.



This Privacy Policy shall be read in conjunction with any other processing notices or additional information we provide to you.

This Privacy Policy is divided into sections so that you can click on the specific areas below.

We strive to ensure the protection of all personal data of our customers, as well as all other information we store, in order to have the trust of our customers and regulators when we implement and use the information we have in new manners.

## II. GENERAL PROVISIONS AND DEFINITIONS

**Iris Solutions Ltd.** is a company registered in Bulgarian CRRNPLE with UIC 204997709, with registered office and address of management: Sofia, Mladost district, 1784, 111B “Tzarigradsko shose” Blvd., Sofia Tech Park, Incubator building, floor 1. The Company is a licensed payment service provider under Art. 4, item 7 and a registered payment service provider under Art. 4, item 8 of the Payment Services and Payment Systems Act (PSPSA). The Company is personal data controller within the meaning of the Personal Data Protection Act (PDPA) and collects, processes and stores your personal data under the terms of this Privacy Policy.

You can contact us at the following contact data:

Address: Sofia, 111B Tzarigradsko shose Blvd., Sofia Tech Park, Incubator building

e-mail: [bdo@irisbgsf.com](mailto:bdo@irisbgsf.com)

If you no longer wish to receive marketing communications, once that you have informed us you agree to receive, please contact us by using the contact data hereinabove.

**"Functionality"** means all the services it provides through the Site and the Applications, which are described in detail in our General Terms and Conditions;

**"Applications"** means the Iris Multibank Wallet application(s) through which you may use certain services, which you can download free of charge from the Google Play Store and AppStore, and other applications of Iris, which, once installed on your mobile device, allows you to certain payment functionalities, which are described in detail in our General Terms and Conditions;

**"GDPR"** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

**"Personal data"** is defined in Article 4, para. 1 of the GDPR (Regulation (EU) 2016/679):



"(1) “personal data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;”.

### **III. COLLECTION OF PERSONAL DATA**

This Privacy Policy is intended to inform you as a user of what categories of personal data about you we may collect or process in connection with your use of the Site and the Applications. We use and can provide the stored data at your request.

We collect personal information about you, including those provided by you:

1. Name, surname, family name;
2. Date and place of birth (including indication of place and country);
3. PIN / PFN or other unique identification number for foreigners contained in an official document whose validity has not expired;
4. Citizenship of the client;
5. Permanent address and country;
6. Address for correspondence in Bulgaria;
7. Type, number and validity of an identity document, date and place of issue, body that issued the document;
8. Identifiers of bank / payment accounts (IBAN, BIC, etc.);
9. Telephone;
10. Email;
11. Data whether you are or are connected with politically exposed persons within the meaning of Art. 36 of the Measures Against Money Laundering Act (MAMLA).

By using the Site or the Applications, you express your informed and explicit consent to provide your personal data in order to be collected and processed by us. Comprehensive information about the use of personal data by us can be found in this Privacy Policy. When providing personal data, you may indicate your consent or refusal to collect or process your personal data.

### **IV. PURPOSE OF PROCESSING**

We use your personal information for the following purposes:

- provision of payment services for which we have a license / permit from the Bulgarian National Bank;
- performing inspections and collecting information in accordance with the requirements of the MAMLA;



- contact you in relation to the services we provide through the Site and the Applications, for example: registration, administration of an account for work with the Applications, as well as for work with it.
- any inquiries or questions you have about our services;
- preventing or detecting fraud, recording suspicious or fraudulent behavior or suspicions of false or inaccurate information;
- compliance with other applicable regulatory requirements;
- marketing goals if you have agreed.

With the fact of providing your personal data, you give your explicit consent to the use of this data for the purposes set out in this privacy policy.

In the event that Iris plans to use your personal data for other purposes, we will notify you in advance and ask for your explicit consent.

## V. GROUNDS FOR PROCESSING PERSONAL DATA:

- We may process your personal data regarding your account on the Site and The Applications on the basis of the agreement signed between us and our legitimate interest (“**account data**”). Your account information is unique and includes your email address, mobile phone number and password, and your account may include your name, email address, date of birth, citizenship and address, bank / payment account number, phone number and email. You provide us with this information in order to register your account and account and use our services. Your account and account data may be processed in order for you to access your account and to provide you with our services by ensuring a high level of security, maintaining secure backups of our database and communicating with you. Account data may also be processed for the purpose of providing full access to the services we provide and monitoring your activity. The legal basis for this processing is the agreement signed between us under the General Terms and our legitimate interests, namely the provision of Services, as well as our obligation to apply identification mechanisms and a high level of authentication in the provision of payment services.
- We may process your data provided in the course of using our services (“**data on the use of the services**”). This data may include registration files for access to our platform, as well as a history of the services provided and used. The source of data for the use of the services is our platform, where you maintain a registered account and account. The data for the use of the services may be processed for the purposes of operation of the application, provision of our services, ensuring the security of the Application and services related to maintaining secure backups of our database and communicating with you. The legal basis for this processing is our legal obligation, the contract signed between us and our legitimate interests, namely the proper administration of our Site and Applications, monitoring to prevent fraud and ensure security.
- We may process the information contained in any inquiries and complaints you send us about our services (“**data for inquiries**”). The information about the inquiries and complaints may be processed for the purposes of offering, marketing and selling the



relevant services to you. The legal basis for this processing is the contract signed between us and our legitimate interest in providing the services we offer, including to improve our communication channels with you.

- We may process information related to the transactions made and the services provided, which is done through the Site and the Applications (“**transaction data**”). Transaction data may include card details, bank account details, and transaction history details. Transaction data may be processed for the purpose of providing services and maintaining proper records of those transactions in our system. The legal basis for this processing is the fulfillment of our legal obligation and the fulfillment of the contract concluded between us.
- We may process the information you provide to us as subscribers to our email notifications and / or newsletters (“**notification data**”). Notification data may be processed for the purpose of sending the relevant notices and/or newsletters. The legal basis for this processing is your consent or the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- We may process the information contained in or relating to any communication you send us (“**correspondence data**”). Correspondence data may include the content of the communication and the metadata related to the communication. Our website generates metadata related to the communication through the contact form or the inquiry form. Correspondence data may be processed for the purpose of communicating with you and keeping records of requested and provided information. The legal basis for this processing is our legitimate interests, namely the proper administration of the website and our contractual relationship, as well as communication with users.
- We may process all personal data specified in this Policy when necessary to establish, exercise or defend / against lawsuits / claims, whether in court proceedings or in administrative or out-of-court proceedings. The legal basis for this processing is our legitimate interests, namely the protection and enforcement of our legal rights, your legal rights and the legal rights of third parties.
- In addition to the specific purposes for which we may process your personal data set out in this Privacy Policy, we may also process your personal data when such processing is necessary to comply with a legal obligation we have or to protect your vital interests. or the vital interests of another individual.
- Please do not provide us with personal data to any other person unless we explicitly request that you do so in connection with the provision of a service we provide.
- By accepting this policy, you expressly agree that the technical processing of the data provided by you will be performed in whole or in part by the Company.
- We may disclose specific personal information required for the purpose of identifying and verifying your identity by our authorized suppliers or subcontractors, where this is reasonably justified for the specific purposes. In any case, you expressly agree, in view of the services we provide, that we may provide your data to banks / payment institutions and other fraud prevention organizations and other organizations, as well as requesting information from them. in connection with the verification of all personal information provided by you, in order to confirm your identity.



- We may disclose your personal information to our professional experts to the extent reasonably justified for the purposes of risk management, obtaining professional advice or establishing, exercising or defending legal claims, whether in administrative or extrajudicial proceedings or court proceedings.
- We may disclose your data and data on received inquiries to one or more of our partners listed on the Site and / or the Applications, in order to perform the services we offer.
- In addition to the specific disclosures of personal information set forth in this Policy, we may disclose your personal information when such disclosure is necessary to comply with a legal obligation we have or to protect your vital interests or the vital interests of another natural person.
  
- Recordings from your web browser to our web page servers and other content on our website are stored. We record information such as your internet service provider and your IP address. We also record information about the software you use to browse our website, such as the type of computer or device and the screen resolution. We use this information to evaluate the popularity of the web pages of our website and how we perform the function of providing content to you. If combined with other information we know about you from previous visits, the data could probably be used to identify you personally, even if you are not logged in to our website. The legal basis for this processing is our legitimate interest and legal requirement to monitor and prevent fraud.
- We may use Personal Data (names, telephone number and email) to send marketing messages (including third party messages) if you have expressly agreed to this and have approved the purpose of your data processing.

## **VI. INFORMATION FROM COOKIES AND OTHER TECHNOLOGIES**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website. They allow you to store information collected on one web page while not needed to use another, allowing the website to provide you with a personalized experience and website owner with statistics on how you use the website to improve. Some cookies may last for a certain period of time, such as one day, or until you close your browser. Others go on indefinitely. Your web browser should allow you to delete everything you choose. It should also allow you to prevent or limit their use.

Our Site uses cookies. They are provided by software that runs on our servers and by software managed by third parties whose services we use.

When you visit our Site for the first time, we ask you if you want us to use cookies. If you choose not to accept them, we will not use them for your visit, except to record that you have not agreed to use them for any other purpose. If you choose not to use cookies or prevent them from being used by your browser settings, you will not be able to use all the functionality of our website.



Most browsers allow you to refuse to accept cookies as well as delete them. The methods for this vary from browser to browser and from version to version. If you block cookies, you will not be able to use all the features of the Site.

## **VII. SPECIAL CASES OF DATA PROCESSING**

For statistical purposes, analysis or compliance with regulatory requirements, we may use anonymised data - personal data processed in such a way that the data subject cannot or can no longer be identified by them. Anonymised data are not considered personal data, respectively the requirements for personal data processing do not apply.

We do not sell products or provide services for purchase by minors. If we learn that we have collected personal information from a person under the age of 18, we will take steps to obtain parental consent from the person or delete the information as soon as possible.

## **VIII. STORAGE AND DELETION OF PERSONAL DATA**

The duration of storage of your personal data depends on the purposes of processing for which it was collected. Iris's policy is to store information only for as long as is necessary for the purpose or purposes for which we process it. The term for storing the data is determined by the following criteria:

- For how long the information is needed, in view of the purpose / purposes for which it is processed - the information is stored until the performance of the respective service and the expiration of the limitation period for filing claims related to the service;
- Existence of legal and regulatory requirements for storage of the information - until the expiration of the envisaged term for storage.

Notwithstanding the other provisions of this section, we may retain your personal data when such retention is necessary to comply with a legal obligation required of us or to protect your vital interests or the vital interests of another individual.

## **IX. SECURITY**

Iris uses reasonable electronic, human and technical measures to protect Personal Data from loss, theft, alteration or misuse. However, keep in mind that even the best security measures cannot completely eliminate all risks.

We strive to protect all information in the application in the manner necessary. However, you are responsible for maintaining the confidentiality of your personally identifiable information by keeping your access passwords confidential and secure. You must change your password immediately if you suspect that someone has gained unauthorized access to it or your account. If you lose control of your account, you must notify Iris immediately of the above contact information.



## X. YOUR RIGHTS

- **The right to be informed**

Iris will provide you with information about the processing when we collect personal data from you (for example, when you open an account), as well as through privacy notices such as this.

- **Right of access**

You have the right to access your personal data and details of how we process them. You can request details about the personal data that the Company holds about you by contacting us at e-mail: [bdo@irisbgsf.com](mailto:bdo@irisbgsf.com)

Proof of identification is needed to protect your information. We also would require applicants to indicate which information and processing activities do they relate in their request (for example, which Iris services relate to the request), as well as and probable processing dates. You may be provided with a standard form to help us verify your identity and find the information you are looking for.

- **Right to rectification**

You have the right to rectify or request rectification of your personal data if it is inaccurate or incomplete.

Iris makes its best effort to keep the personal data processed accurate and up-to-date. However, we rely on our customers to make sure that some of the information which is related to them, is accurate and up to date. We encourage customers to notify Iris in case of any changes to their information (for example, by updating your account information).

- **Right to object**

You have the right to object to certain uses of personal data, such as direct marketing.

- **Right to erasion**

You have the right to request that we delete or remove personal data from our records when there is no good reason to continue processing them. Where personal data are still needed for lawful purposes, it will not be possible to delete this data, so some requests may be rejected.

- **Right to restriction of processing**

You have the right to "block" the processing of personal data in limited circumstances. This right may be exercised:

- If the accuracy of your personal data is disputed and needs to be verified;
- If the processing is illegal, but you do not want the personal data to be deleted; or





- If personal data is no longer required by Iris, but you want the data to be retained for legal purposes.

- **Right to data portability**

This right applies only to personal data that is provided to us in a structured, widely used and machine-readable format and which we process on the basis of your consent or to enter into a contract with you.

The right to data portability allows individuals to reuse their personal data in different services; allowing them to move or copy data from one organization to another if they choose.

- **Right to withdraw your consent**

When we process personal data on the basis of your consent, the consent should be freely expressed, specific, informed and unambiguous, given through a statement or clearly confirmatory action. *Such action is considered the consent given through the notification of the Site or the Applications.*

You have the right to withdraw your consent to the processing of your personal data at any time with a separate request addressed to Iris in the case of processing based on a given consent.

- **Complaint to the supervisory authority**

You have the right to lodge a complaint directly with the supervisory authority, the competent authority being the Commission for Personal Data Protection:

Commission for Personal Data Protection, Sofia, 1592, 2 Prof. Tsvetan Lazarov Blvd.,  
tel: + 3592 / 91-53-518, E-Mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

In the event that you wish to exercise any of these rights, please contact us through the contacts provided in Section II of this Privacy Policy.

## **XI. QUALITY ASSURANCE MONITORING AND TRAINING**

We endeavour to ensure that the services we provide to our customers are of the highest possible standard. To this end, we may sometimes need to record telephone and electronic communications between our employees and third parties in order to ensure quality and training or, if permitted by law, only after you have been notified. We will always monitor communications in accordance with applicable law and will at all times continue to protect the confidentiality of your communications in accordance with these rules.



## **XII. PROVISION TO THIRD PARTIES**

Our Site and Applications does not offer publication of your personal information. We in no way upload personal information to our customers within the Site. Any inquiry or filling in of a form on the Site containing personal data is not saved on the Site. In the Site and the Applications we can publish only data containing company information of our clients and partners, which is publicly available on the site of the Commercial Register of the Republic of Bulgaria.

There are some applications on the site that can collect personal data used by third parties, such as Google, Facebook, Pinterest and others, such as:

- buttons for sharing and liking social networks which are posted on the Site.

When publishing personal information, it is up to you to verify the level of confidentiality of each of the listed social networks that may use them. For your convenience, we add links to the Privacy Policy pages of the social networks and platforms hereinabove. Privacy policies:

[Google Analytics Privacy Policy](#) - Our website uses this platform. [Google.bg](#)

[Facebook Privacy Policy](#) - Our website uses this platform.

We do not explicitly use this information except to display or share it for the purpose of promoting discussions and accessing all features of this Site, including contacting us through our contact form.

On pages containing publications on our site, you have the opportunity to add comments under each of the publications, and before clicking the button to publish your comment, you agree that your (personal data) - Name and Surname will be displayed and may become available to "Third Parties" over which we have no control.

Once your information enters the public domain, such as your name, when you comment, we have no control over what any third party can do with it. We are not responsible for the actions of third parties.

Provided that your request is reasonable and there is no legal basis to keep it, then at our discretion we may accept your request to delete the personal information you have posted. You can request this through our contact form on our webpage.

We may need to transfer your personal information to business partners and service providers located in territories outside or outside the European Economic Area ("EEA"). For example, we may process payments through other organizations such as banks / payment institutions, card networks and payment schemes located in or outside the EEA. When downloading and using the Applications and Site, you expressly agree to this. Please note that we will never transfer your personal data to a country or organization that does not offer



itenough level on Protection, without Yours expressly informed consent. **The protection provided by the GDPR follows the data provided by you**, which means that the rules on personal data protection continue to apply, regardless of where the data is located. This also applies when the data is transferred to a non-EU country (hereinafter "third country").

### **XIII. REFERENCES**

Sometimes the Site and / or the Applications may contain links (hyperlinks) to other websites. We do not operate the linked sites and do not endorse the content, services and products of these sites. We advise you to use the linked sites carefully and with due regard to their content and terms of use. Iris is not responsible for the privacy policies or content of such sites, and we encourage you to review their privacy policies. However, as soon as we receive information about illegal activities or illegal information on such websites, we will take immediate measures to remove electronic links to them.

### **XIV. MISCELLANEOUS**

Iris may update this policy periodically by publishing a new version of the Site and / or the Applications. All changes and additions to the Privacy Policy will be applied only after the publication of its current content.

Notwithstanding the above, we reserve the right to notify you at the email address you provide of changes to these policies. That is why you must always keep your contact details up to date.

If you have any questions or comments about this Privacy Policy, please contact us at [bdo@irisbgsf.com](mailto:bdo@irisbgsf.com).