

Data Protection Terms and Conditions (Privacy Policy)

Investment gold, silver and platinum

1. General terms and conditions

- 1.1 This document (hereinafter “**Data Protection Conditions**”) clarifies how ME Company OÜ, registry code 12961845; address Aia 5, Tallinn 10111, Estonia; telephone +372 6008250; e-mail info@moneyexpress.ee, that provides financial services under the Moneyexpress trademark (hereinafter “**Moneyexpress**”) uses its customers’ personal data and ensures lawful processing, confidentiality, and security thereof.
- 1.2 Moneyexpress is liable for performance of its obligations and ensuring of security and fair processing of personal data by its employees and in its systems.
- 1.3 Moneyexpress processes personal data in adherence to the principles provided for in the General Data Protection Regulation, the Republic of Estonia Personal Data Protection Act, the Republic of Estonia Money Laundering and Terrorist Financing Prevention Act, other relevant legislation, and these Data Protection Conditions.
- 1.4 Moneyexpress has the right to unilaterally amend these Data Protection Conditions at any time, disclosing a notice thereof on the web page www.moneyexpress.ee.

2. Definitions:

Personal data – any information on a natural person who has been identified or is identifiable

Special categories of personal data – personal data which reveal racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning a natural person's sex life or sexual orientation

Biometric personal data – personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data, eye iris images etc. (incl. photographs and copies thereof, personal data obtained by video recording)

Data subject – an identifiable natural person. A person 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 physiological, genetic, mental, economic, cultural or social identity of that natural person. In this case, data subjects are Moneyexpress customers who wish to purchase gold, silver or (hereinafter “**Customer**”)

Controller – ME Company OÜ, registry code 12961845; address Aia 5, Tallinn 10111, Estonia; telephone +372 6008250; e-mail maxim@mec.lv

Processor – a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller (Moneyexpress)

Third party – a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data

Processing – any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

Personal data breach – a breach of security leading to the destruction, loss, or alteration as well as unauthorized disclosure of, or enabling of access to processed personal data

3. Which Customer data does Moneyexpress collect?

- 3.1 First name and surname;
- 3.2 Telephone number;
- 3.3 Address;
- 3.4 Origin of funds;
- 3.5 Information on the validity of the identity document;
- 3.6 Information on the existence or absence of financial sanctions;
- 3.7 Information on whether or not the list of blocked persons belongs;
- 3.8 Type and number of identity document;
- 3.9 A copy of the identity document (incl. A copy of the information and photo on the document).
- 3.10 identifying information through a bank link, ID card, mobile ID and Smart-ID service;
- 3.11 When signing the contract using an ID card - ID card, DigiDoc4 client software version data, DigiDoc library version number, computer operating system name and version number, container format information, user certificate serial number, user IP address;
- 3.12 When signing the contract using Mobile-ID - DigiDoc4 client software version data, computer operating system name and version number, user's personal identification code, telephone number and IP address.
- 3.13 When signing a contract using Smart-ID - DigiDoc4 client software version number, computer operating system name and version number, user ID and IP address
- 3.14 Data obtained by video recording:
 - 3.14.1 Customer's facial image and facial expressions;
 - 3.14.2 Customer's behavior;
 - 3.14.3 Customer's movements;
 - 3.14.4 Customer's clothing;
- 3.15 Data obtained during use of the Moneyexpress web page:
 - 3.15.1 Cookies;
 - 3.15.2 Data of used browser;
 - 3.15.3 IP address.

4. Where the Customer visits Moneyexpress' we page, Moneyexpress, for the purpose of performing its obligations arising from law, providing the service quality promised in

relevant contract, and a more convenient service, and for the purpose of marketing, collects cookies in addition to data listed in item 2. The terms and conditions and procedure for the collection of cookies are available at <http://www.moneyexpress.ee/privaatsuspoliitika/>.

5. For what does Moneyexpress use the Customer's personal data (purpose of processing of personal data)?

- 5.1 Customer identification;
- 5.2 Performance of the contract concluded or conclusion of a contract with the Customer;
- 5.3 Performance of requirements prescribed by law.
- 5.4 Video recording is used in currency exchange points to ensure security and quick dispute resolution.

6. How and from where does Moneyexpress collect the Customer's personal data (source of collection of personal data)?

- 6.1 From the Customer upon the Customer giving statements;
- 6.2 From the Customer's legal representative (incl. based on authorizations);
- 6.3 From the Customer's identity document;
- 6.4 During video surveillance. Video recording starts automatically upon the Customer's or potential Customer's movement at or in the vicinity of currency exchange points operated by Moneyexpress;
- 6.5 Through the browser used by the Customer as a visitor to Moneyexpress' web page.

7. On which basis does Moneyexpress process the Customer's personal data (basis for processing of personal data)?

- 7.1 Moneyexpress processes data subjects' personal data for the purpose of:
 - 7.1.1 Performing the contract concluded with the Customer;
 - 7.1.2 Concluding a contract with the Customer or preparing a contract where the data subject proposed the conclusion of the contract;
 - 7.1.3 Performing obligations arising from legislation (foremost but not only the Republic of Estonia Money Laundering and Terrorist Financing Prevention Act).
 - 7.1.4 In the case of legitimate interest, Moneyexpress processes personal data collected during a video recording.
 - 7.1.5 Moneyexpress processes personal data collected during a visit to its web page where there is legitimate interest and for the purpose of compliance with a legal obligation.

8. To whom does Moneyexpress forward/discard the data subject's personal data?

- 8.1 Moneyexpress does not forward or disclose the Customer's personal data to third parties, except where the obligation to forward or disclose personal data arises from legislation.

9. For how long does Moneyexpress store personal data?

- 9.1 Moneyexpress stores the Customer's personal data for 5 (five) years as of collecting the data.
- 9.2 Personal data collected during video surveillance is normally stored for 2 (two) - 5 (five) months. Depending on the frequency of movement of Customers in the vicinity of the currency exchange points, the storage term may be shorter or longer.

9.3 The storage terms for data collected during use of Moneyexpress' web page are provided for in the principles on the use of cookies available at <http://www.moneyexpress.ee/privaatsuspoliitika/>.

10. The Customer has the right to:

- 10.1 Access their personal data and obtain printouts and copies regarding their personal data;
- 10.2 Request information on the types of data processed and the purpose of such processing;
- 10.3 Request rectification of their personal data where the data is incorrect or inaccurate;
- 10.4 Request erasure of their personal data where processing of the personal data is no longer necessary;
- 10.5 Request restriction of processing of their personal data where the Customer has submitted a request to have their personal data rectified or erased or where the Customer has contested the accuracy of the personal data processed;
- 10.6 Lodge a complaint with a data protection specialist by e-mailing andmekaitse@krabugrupp.ee;
- 10.7 Lodge a complaint with the Republic of Estonia Data Protection Inspectorate (www.aki.ee, Väike-Ameerika 19, 10129 Tallinn, Estonia) where the Customer finds that processing of their personal data is not lawful.

11. Moneyexpress' activities to ensure lawful processing and security of personal data

- 11.1 In processing personal data, Moneyexpress is guided by the principles of lawfulness, transparency, purposefulness, and minimality as well as by data protection requirements prescribed by applicable law.
 - 11.2 Moneyexpress processes personal data only for purposes described in item 5 of this document (For what does Moneyexpress use the Customer's personal data?).
 - 11.3 Moneyexpress stores personal data only in such an extent which is necessary for purposeful processing of personal data.
- 1.1 Moneyexpress has employed physical and technological security measures to ensure lawful processing and protection of personal data.
 - 1.2 Moneyexpress performs the Customer's information request or employs a measure requested by the Customer without delay, yet no later than within 30 (thirty) calendar days as of receipt of the information request. Where Moneyexpress finds that the information request is not legitimate, it informs the data subject thereof without delay, yet no later than within 30 (thirty) calendar days. Where performance of the data subject's information request is complex, the aforementioned term may be extended to no more than 60 (sixty) calendar days.
 - 1.3 Moneyexpress performs the Customer's legitimate information request free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may charge a reasonable fee or refuse to act on the request.