



Customer Privacy Notice for personal Account Users in the UK and EEA

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1. Reasons for reading this notice

We collect your personal data when you utilize:

- Our website at <https://e.pn>
- Any of the services available to you through our website

Similarly, we may also receive your personal data from other people or companies. The term “personal data” shall include the following:

- Your personal information regarding payment processes (for instance, the Company knows when you utilize our payment services)
- Your personal information that can identify you (for instance, your name, e-mail, etc.)

This privacy notice can be used as an explanation of how we collect your personal data, its usage and storage.

These Notices:

- Shall provide you more information about how E.PN collects, uses and protects your personal data when you use certain E.PN payment services
- Shall be available at any time through the E.PN website (<https://e.pn>).

The explanations stated in this Privacy Notice shall help you understand what personal data E.PN collects, utilizes or shares about you as part of the payment service.

We may provide legal documents and policies (explanations, notices) in languages other than English. If there is any discrepancy between the other language versions and the English language version, the English language version shall prevail.

If you have any concerns about the way we use your personal data, you can contact us at support@epn.net.



2. Personal data that E.PN collects

The following shall explain what personal data E.PN collects, utilizes, stores.

Type of personal information	Explanations
Data that E.PN collects from you	<p>E.PN collects data provided by you when you:</p> <ul style="list-style-type: none">– Fill in any forms;– Communicate with us;– Reply to any of our surveys;– Open an account or use any of our services;– Participate in online discussions or promotions;– Contact a member of our customer service or social media team;– Communicate with us for any other reasons. <p>We also will collect the following information:</p> <ul style="list-style-type: none">• Your name, address and date of birth when you're going through Know-Your-Customer ("KYC") procedure;• Your email address, details of the device you use;• Your registration information;• Copies of your identification documents that you provide during KYC procedure (for instance, your full name, date of birth, country of residence, number of your identification document, photo, selfie with the document, etc.);• Records of our discussions, if you contact us or we contact you;• Data regarding your Telegram account.• Copies of your identification documents that you provide during KYC procedure (for instance, your full name, date of birth, country of residence, number of your identification document, photo, selfie with the document, etc.);



	<ul style="list-style-type: none"> • Records of our discussions, if you contact us or we contact you; • Data regarding your Telegram account; • Copies of your identification documents that you provide during KYC procedure (for instance, your full name, date of birth, country of residence, number of your identification document, photo, selfie with the document, etc.); • Records of our discussions, if you contact us or we contact you;
Data collected from your use of our payment service	<p>Each time you use our website 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 details, browser type and version, time zone settings, device language, operating system and platform, the type of device you are using, whether your device uses a Virtual Private Network (VPN), mobile network information, the operating system of your mobile device, and your mobile phone number; – Information about your visit, including links you clicked to and from our website or app (including date and time), services or searches you viewed, page response times, loading errors, how long you visited certain pages, information about your interaction with the pages (such as scrolling and clicking), and the methods used to navigate away from the page.
Data from publicly available sources	We collect information / data and contact details from publicly available sources, for instance, websites for enhanced due diligence checks, security searches, KYC purposes.

3. Legal basis for usage of your personal data

E.PN shall have a legal basis for using your personal data. The below stated shall be such legal basis:



- **Compliance with our agreements with you**

We are required to have certain personal data in order to provide our services and we cannot provide them without that personal data.

- **Legal Obligations**

In some cases, we are legally responsible for collecting and storing your personal data (for example, we are required by anti-money laundering laws to hold certain information about our customers).

- **Lawful interests**

We sometimes collect and use your personal data because we have a legitimate reason for using it and it is reasonable when we compare it against your human rights and freedoms.

- **Substantial public interest**

If we process your personal data or sensitive personal data (sometimes known as special category personal data) to comply with government regulations or guidance, for example, we have a duty to prevent fraud or support you if you are or have become a vulnerable customer.

4. The ways we use your personal data

The following shall explain what personal data E.PN collects, utilizes, stores.

The reason of using your personal data	E.PN's legal basis for using your personal data
<p>Verifying your identity</p> <p>When you sign up to E.PN, we shall use your personal data to verify your identity or the identity of joint account holders (as part of our KYC process);</p> <p>This may involve you sending your documents (passport, etc.), sending selfies to verify you as a person.</p>	<ul style="list-style-type: none">• Legal obligations;• Substantial public interest;• Consent (if it is required by applicable law);
<p>Provision of our payment services</p>	<ul style="list-style-type: none">• Fulfillment of the obligations set forth in our agreements with you;



When you apply for or use an E.PN's payment services, we utilize your personal data to:

- Decide whether or not to approve your application (during KYC process);
- Fulfill our contractual and legal obligations relating to any services you use (for example, to make payments to and from your E.PN's account);
- Help us to understand your behavior, how you use E.PN's services, and help you save money;
- Collect debts 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 telephone calls, for the purposes of keeping relevant records, checking your instructions, analyzing, evaluating and improving our services and for training and quality control purposes.

- Lawful interests (we have to know how we fulfill our obligations and we want to provide you with quality products and services);

- Legal obligations.

Fraud protection

We use your personal data to verify your address and identity, to protect you from fraud, to comply with financial crime laws and to confirm that you are authorized to use our services. We also use them to better understand your financial circumstances and manage the fraud risks associated with your E.PN's account.

- Lawful interests (in order to develop and improve the ways we handle financial crime and meet our legal responsibilities);

- Substantial public interest;

- Consent (if it is required by law);

- Legal obligations.



<p>Marketing and providing products and services that may interest you</p> <p>We use your personal data for the following purposes:</p> <ul style="list-style-type: none">– To personalize your in-app experience and marketing messages about our products and services to make them more relevant and interesting to you (where permitted by law). This may include analyzing how you use our products, services and your transactions;– If you agree, provide you with information about promotions or offers that we think may be of interest to you;– Ask your opinion about our products or services.	<ul style="list-style-type: none">• Lawful interests (in order to send direct marketing, ensure our direct marketing is relevant to your interests, develop our payment services, to be efficient how we meet our legal and contractual duties);• Consent.
<p>To maintain our services</p> <p>At E.PN, we use your personal data to manage our website (including troubleshooting, data analysis, testing, research, statistics and surveys) and to make sure content is presented in the most effective way for you and your device;</p> <p>In addition, we use your personal data to:</p> <ul style="list-style-type: none">– Authenticate you as an authorized user of our services where necessary (for example, if you contact our customer service or social media);– Allow you to participate in interactive features of our services;– Notify you of changes to our services;– Help maintain the security and reliability of our website.	<ul style="list-style-type: none">• Compliance with our agreements with you;• Lawful interests;• Consent (if it is required by law).



<p>Social interaction assistance</p> <p>We use your personal data to help you interact socially through our services or to add additional features to provide a better experience.</p>	<ul style="list-style-type: none">• Lawful interests (to develop our payment services and be efficient in meeting our obligations);• Consent.
<p>To fulfill our legal obligations, enforce our rights, protect our business and other lawful purposes</p> <p>We use your personal data:</p> <ul style="list-style-type: none">– To share with other organizations (e.g. government agencies, law enforcement agencies, tax authorities, fraud prevention agencies)– If it is necessary to fulfill our legal or regulatory obligations– To identify and support vulnerable customers by allowing you to let us know if you need help, or by analyzing your behavior through our website, in customer service messages and in transactions (for example, we shall try to identify if you are potentially vulnerable so that we can provide you with enhanced support. Identifying and supporting vulnerable customers is a legal requirement for us in some countries)– To protect ourselves, including our rights, property, personnel or products– To prevent and handle harmful or unlawful behavior and spam (in accordance with the E.PN’s Community Standards)– In connection with legal claims– To help detect or prevent crime.	<ul style="list-style-type: none">• Lawful interests (in case it is necessary to protect E.PN during a legal dispute);• Substantial public interest (when we process your sensitive personal information to correspond to legal requirements that are applicable to us;• Legal obligations.



5. Automated decisions regarding users

Depending on the E.PN's payment services you use, we are able to make automated decisions about you.

This means that we may use technology to assess your personal circumstances and other factors to predict risks or outcomes. We do this to run our services effectively and to make sure decisions are fair, consistent and based on the right information.

If we make an automated decision about you, you have the right to ask for it to be reviewed manually by someone.

For example, we are able to make automated decisions about you relating to:

Account opening:

- KYC, anti-money laundering and sanctions checks;
- Identity and address verification.

Fraud Detection:

- Monitoring your account to detect fraud and financial crime.

Our legal basis is one or more of the following:

- Correspondence to contracts and agreements between you and us;
- Legal obligations;
- Legitimate interests (to develop and improve the way we fight financial crime and fulfill our legal duties).

6. Sharing your personal data with third parties

E.PN may transfer your data to our counterparties (partners, branches, etc.) in different countries. The Customer's Personal Data may be stored, transferred and otherwise processed in countries outside the Customer's country of residence, which are countries that are part of the EEA or have received adequacy recognition by the European Commission, as well as countries that have not received adequacy recognition by the European Commission.



E.PN shall protect Personal Data when it is transferred to recipients outside the EEA and takes all steps reasonably necessary to ensure that Personal Data is processed securely in accordance with this Privacy Notice.

However, you shall acknowledge that you understand and accept that these countries may have different laws that provide a lower level of protection for Personal Data and that such Personal Data may become subject to disclosure laws and requirements in those countries, including disclosure to governmental authorities, regulatory agencies and individuals, as a result of a relevant governmental or regulatory request, court order or other similar process. For the avoidance of doubt, by accepting this Privacy Policy, Customer agrees that Personal Data may be transferred to a country that has not been recognized as adequate by the European Commission.

7. Sharing your personal data outside the United Kingdom and Europe

Since we provide international payment services, we may need to transfer your personal data outside the UK or the European Economic Area (EEA) to help us provide our services.

For example, if you make an international payment, we send funds to banks outside the UK or EEA. We may also send your personal data outside the UK or EEA to comply with global legal and regulatory requirements and to provide ongoing support services.

We may send your personal data outside the United Kingdom or EEA to:

- Comply with global legal and regulatory requirements
- Provide ongoing support services
- Fraud prevention agencies or law enforcement agencies
- To enable us to provide you with the products or services you have requested.

If we transfer your personal data to another country that does not offer data protection standards equivalent to the UK or EEA, we will ensure that your personal data is adequately protected. For example, we will make sure that a contract with strict data protection safeguards is in place before transferring your personal data. In some cases, you have the right to ask us for a copy of such a contract.



8. The ways E.PN protects your personal data

We realize the importance of protecting and managing your personal data. Any personal data we process will be handled with the utmost care and security. This section describes some of the security measures we use.

We use a variety of organizational and technical measures to:

- Maintain the confidentiality, availability and integrity of your personal data;
- Ensure that your personal data is not used or disclosed inappropriately.

We have detailed information security and data protection policies that our employees are required to follow when handling your personal data. Our staff are trained in data protection and information security.

Personal data is stored on secure computer systems with access control controls restricting physical, system and data access to authorized staff only.

E.PN has strict policies in place to control the transfer of your personal data to other companies. Before we share personal information with any company, we carefully

- Company's due diligence;
- Evaluate the security controls the company has in place to protect your personal data.

Although we take all reasonable steps to ensure that your personal data is protected from unauthorized access, we shall not guarantee its security when transferred to our website or other services we may provide.

9. Storage duration of your personal data

We shall retain your personal data:

- For as long as necessary to fulfill the original purpose for which we collected it;
- In accordance with applicable law.



We are required to retain certain personal data for a certain period of time in accordance with KYC, anti-money laundering, banking and e-money laws. These time periods vary from country to country. E.PN has detailed policies and procedures in place to ensure compliance with these requirements. We may retain your personal data for a longer period of time due to potential or ongoing legal action or other legitimate reason.

10. Amendments to this Customer Privacy Notice

If we alter the way we use your personal data, we shall renew this notice and, where appropriate, notify you by email, or on our website.

11. Cookies on our website

We use cookies to analyze how you use our website. For more information about our Cookie Policy, please see our [Cookie Policy](#).