



**UAB GLOBIANCE LT**  
(Trading as *Globiance Europe LT*)

Registration Number: 306059802

**Privacy Policy**

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# PRIVACY POLICY

## **1. General Provisions**

- 1.1 These are Globiance LT's policies and principles in regard to the processing of client data (hereinafter referred to as the "Privacy Policy").
- 1.2 This Privacy Policy describes how we process your data.
- 1.3 Specific details on the processing of your data may be provided for within additional client agreements you hold with Globiance LT and through the use of our Services.
- 1.4 This Privacy Policy shall apply if and/or when you enter into a client agreement with Globiance LT, use our provided Service(s), submit a request to us, provide your consent to process your data, and/or visit the Globiance LT Website (<https://eu.globiance.com/>).
- 1.5 Globiance LT shall have the right to amend this Privacy Policy at our sole and absolute discretion at any time and in accordance with applicable legislation and regulations.
- 1.6 We shall inform all users of the amendment of this Privacy Policy via a notification on our Website.

## **2. Definitions**

- 2.1 "Client" and/or "You" refers to any natural person and/or any representative of a legal or natural person, who uses, has used, or expressed a wish to use our Services, who created an account, submitted a request to Globiance LT, and/or visited our Website.
- 2.2 "Data" refers to any information provided to Globiance LT by a Client, representatives of Clients, any other person who has contacted Globiance LT, and another person who has contacted Globiance LT; this includes data collected from public databases and/or through public channels.
- 2.3 "Data Controller", "we" and/or "us" respectively refers to **Globiance LT** bearing registration number **306059802 and having its registered address at Vilnius, Eišiškių Sodų 18th st. 11., Lithuania.**
- 2.4 "Data Processor" refers to anyone who processes Client data on behalf of the Data Controller.
- 2.5 "Digital Asset", "cryptocurrency" and/or "digital currency" refers to a digital representation of value which is based on the cryptographic protocol of a computer network.
- 2.6 "Account" means a Client accessible account offered via and facilitated by Globiance LT.
- 2.7 "Recipient" refers to a natural and/or legal person, public authority, agency, and/or another appropriate body, to which the Data is disclosed.
- 2.8 "Processing (Client Data)" refers to any operation executed with Data, including – but not limited to – the collection, recording, organisation, storing, alteration, publication, use, transmission, deletion, etc. of Client Data.
- 2.9 "Service(s)" refer to any services provided by Globiance LT to Clients via any service channel, including – but not limited to – websites, applications, and/or tools.
- 2.10 "Client Agreement" refers to any legal relationship(s) between Globiance LT and Clients which are entered into in order to perform and/or provide any Services to Clients.
- 2.11 "Request" refers to any request(s) submitted to Globiance LT by Clients for the purposes of entering into agreement(s), gaining conclusion(s), making amendment(s), and the termination and/or cancellation of Services.

- 2.12 “Website” refers to the following Globiance LT websites: <https://www.eu.globiance.com/> and/or <https://www.globiance.com/>.
- 2.13 “AML/CTF Regulations” refers to anti-money laundering (“AML”) and counter-terrorism financing (“CTF”) regulations.
- 2.14 “GDPR” refers to the *General Data Protection Regulations* (GDPR EU nr 2016/679) of the European Parliament and of the EU 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.

### **3. General Principles of Processing Data**

- 3.1 Globiance LT strictly processes your Data under the terms and conditions as prescribed for within this Privacy Policy and in accordance with procedures provided for within the applicable legislation and regulations, including the GDPR, Law on Legal **Protection of Personal Data** of the Republic of **Lithuania** (hereinafter referred to as LPPDL), Law on the Prevention of Money Laundering and Terrorist Financing (Law), this Privacy Policy, and any other Client Agreement(s).
- 3.2 We ensure the confidentiality of all Data and ensure the implementation of appropriate technical and organisational measures in order to best safeguard your Data from unauthorised access, unlawful disclosure, accidental loss(es), unfounded modification, destruction, and/or any other unlawful processing, all within the framework of the appropriate and applicable data protection legislation.
- 3.3 Globiance LT shall take all reasonably necessary steps in order to ensure that your Data is treated securely and in accordance with this Privacy Policy; and that no unauthorised transfer(s) of your Data will take place to an organization and/or a country unless there are adequate controls in place including the security of your Data and other personal information.

### **4. What Data Do We Collect?**

Globiance LT follows the following processes according to the various categories of Data:

<b>Personal Data</b>	Full name, personal identification number, date of birth, place of birth, and signature.
<b>Contact Data</b>	Residential address, contact number, and e-mail address.
<b>Financial Data</b>	Bank account information, transactions, liabilities, online payments, money transfers, payment methods, prices, quantities, time, authorization information, order activity history, etc.
<b>Data regarding Provided Services</b>	Transaction details (e.g., quantity, product, price), data about Client agreement(s), data regarding the performance of agreements, data regarding violations of agreement(s), notices, service fees, enquiries, complaints, and submitted requests.
<b>Identification Data</b>	Data held within identity documents (e.g., full name, issuing country, unique identifying number, expiration date, MRZ codes, information on barcodes, etc.), photographs taken from you, videos and sound recordings, electronic signature data, and/or any other data received through third-party identification services.
<b>Data connected with AML and CTF Regulations</b>	Client’s photographic identification, country of residence, data of identity documentation, source of funds, the origin of assets, place of work, position

held, occupation, data pertaining to the identification and classification of *Politically Exposed Persons* (hereinafter referred to as “*PEPs*”), etc.

**Communication Data**

Requests, records of communication data collected via any communication channel utilized with Globiance LT, including – but not limited to – communication via phone, e-mail, online live chat features and/or any other manners of communication.

**Service Usage Information**

Access dates and times, device types, device identification information, operating systems and hardware settings, browser types, and information derived from SIM cards, network operators, IP addresses, and/or GPS.

**Other Data**

Data obtained while performing obligations arising from the law, including data arising from the enquiries made by investigative bodies, notaries, tax authorities, bailiffs courts and other state institutions.

**5. How Do We Process Your Data?**

- 5.1 Globiance LT processes your Data in order to provide you with our Service(s), to establish a Client Agreement with you, to respond to your request(s) and communicate with you, as well as to perform necessary Know Your Client (hereinafter referred to as “*KYC*”) and the Customer Due Diligence (hereinafter referred to as “*CDD*”) obligations arising from applicable laws and regulations.
- 5.2 In order to create an account, Globiance LT processes your personal data, contact data, location data, and communication data. The legal basis of processing such data is your consent. You may withdraw your consent at any time and Globiance LT will refrain from the performance thereof, however kindly note that this will affect the provision of our Service(s) to you. We will not maintain and/or continue business relationships with any Client who does not provide the consent necessary for Globiance LT to process such Data.
- 5.3 In order to make use of the Globiance LT Platform and Service(s), you will have to undergo the general registration process(es) as provided for on our Sites. This includes – but is not expressly limited to – undergoing the applicable *KYC* and *CDD* verification procedure(s) as Globiance LT sees fit for your particular application. For these purposes, Globiance LT processes your identification data as well as data obtained, received, and/or generated in the course of fulfilling our legal obligation(s) for your appropriate identification verification. Should you fail to provide such data, Globiance LT cannot and will not activate your account and/or provide you with our Service(s).
- 5.4 Globiance LT processes your personal data, contact data, and communication data in order to communicate and enter into a Client Agreement with you. This data is statutory for entering into a Client Agreement. The legal basis of processing such data is the express establishment of a Client Agreement. Should you fail to provide such data, Globiance LT cannot and will not provide you with our Service(s).
- 5.5 Globiance LT processes your financial data, data regarding the Service(s) provided to you, communication data, and data obtained, received, and/or generated in the course of fulfilling our legal obligation(s) to undergo and establish a Client Agreement with you. This includes – but is not limited to – reviewing, investigating, and preventing any potentially prohibited and/or illegal activities which may violate the Client Agreement. The legal basis of processing such data is the express establishment of a Client Agreement. Should you fail to provide such data, Globiance LT cannot and will not provide you with our Service(s).
- 5.6 Globiance LT processes Data connected with AML and CTF regulations in order to check and verify your identity and to maintain current, correct, and updated records of your Data. This is necessary in order to comply with rules and regulations applicable to Globiance LT and its AML and CTF obligations. We will explain the content and requirements of such Data each time we collect said Data from you. Globiance LT reserves the right to amend and/or update the content and requirements of the information and Data we require for collection in order to comply with ever-changing regulatory obligations and internal policies. The processing of this Data is vital for Globiance LT to ensure its compliance with legal obligations arising from AML and CTF regulations which we are subject to. Should you fail to provide such Data, Globiance LT cannot and will not provide you with our Service(s).

- 5.7 Upon accessing your Globiance LT Account, visiting our Site(s), and/or making use of our Service(s), we may process your service usage information and location data in order to ensure that our interface is accessible for you and/or to customize, measure, and improve our Service(s), the content of our Site(s), as well as for the development of new Service(s). The legal basis of processing such Data is for our legitimate and express internal interest.
- 5.8 Globiance LT processes Data regarding your full name and e-mail address based on your consent in order to send you information about our Service(s), applicable updates to our policies and procedures which pertain to you, as well as to provide you with direct marketing messages. Your consent contains information regarding specific processing activity and allowances. You may withdraw your consent at any time and Globiance LT will refrain from the performance thereof.

## **6. How Do We Collect the Data?**

- 6.1 Most of the Data that Globiance LT collects, and processes is directly provided by you. We collect and process the information about you in the following situation(s):
- i. When you visit our Website, create an Account, log in, and/or make use of our Service(s);
  - ii. When we provide Services to you and/or perform our ongoing obligations;
  - iii. When you communicate and/or provide feedback to us via e-mail, live chat, or any other communication channel;
  - iv. When you enable the use of Cookies in visiting and/or using our Website and Service(s); and
  - v. Other situations when we may collect your Data as prescribed for within this Privacy Policy.
- 6.2 Globiance LT may additionally collect information about you from public and/or third-party sources – such as public databases, identification verification partners, payment providers, companies providing services for money laundering and terrorist financing screening, credit risk reduction, blockchain data, marketing partners, as well as through the use of other fraud and financial crime prevention tools and companies providing similar services.

## **7. Do We Use “Cookies”?**

- 7.1 Yes. We use Cookies whenever you visit our Site(s). The Cookies used are listed in our Cookie Policy, and are openly available on our Website: <https://eu.globiance.com/>
- 7.2 You may choose to have your respective device warn you each time a Cookie is being sent. Kindly contact your respective device’s help centre for the processes to follow in order to achieve these settings.

## **8. Third-Party Disclosures**

- 8.1 Globiance LT does not trade, sell, and/or otherwise transfer your Data to other parties, unless you provide us with explicit consent to transfer such Data.
- 8.2 Globiance LT only discloses Data to our relative Recipients, such as:
- i. Identification and verification partners, as well as fraud management partners, in order to perform identification verification and comply with our AML and CTF obligations;
  - ii. Our Website hosting partners and other parties who assist Globiance LT in operating our Site(s);
  - iii. Respective payment services providers;
  - iv. Companies providing services for potential money laundering and terrorist financing risk screening, credit risk reduction service providers, relevant financial institutions, credit reference agencies, regulatory bodies, other fraud and financial crime prevention tools and companies providing similar services with whom such Data is necessary to be shared;
  - v. Partners who provide us with accountancy services;
  - vi. Financial and legal consultants, auditors, and/or any other data processors of the Data Controller;

- vii. Data related to the violation of a Client Agreement to debt collectors in order to collect necessary funds.
- 8.3 Globiance LT may release your information to public authorities and/or state institutions from time-to-time if and/or when the belief of such release of Data is appropriate to comply with the law or protect the rights, property, and/or safety of Globiance LT or others. These include – but are not limited to – law enforcement agencies, bailiffs, notaries, tax authorities, supervisory authorities, the Police, and/or the FNTT).
- 8.4 Globiance LT will not disclose more Data than that which is necessary for the purposes of the respective Data disclosure and with respect to regulatory legislation and applicable data protection regulations.

## **9. Retention of Your Data**

- 9.1 Globiance LT will retain your Data for only as long as is reasonably necessary for the purposes as set out in this Privacy Policy, or as required by regulatory legislation and/or applicable data protection regulations.
- 9.2 Globiance LT retains your Data for the establishment and adequate performance of a Client Agreement between you and Globiance LT. Such retention period is extended to **eight (8) years** as of the date of termination of your Client Agreement with Globiance LT. We retain your Data related to AML and CTF for **eight (8) years** as of the date of termination of your Client Agreement and ultimately our business relationship with you.
- 9.3 Globiance LT will retain and use your Data only to the extent as is necessary to comply with our legal obligations. This includes – but is not limited to – if we are required to retain your Data to comply with applicable data retention laws, resolve disputes, and/or enforce our internal Agreements and Policies.

## **10. Data Protection Rights**

You have the following rights regarding the protection of your Data:

- 10.1 To apply for any correction(s) of incorrect and/or incomplete information and Data;
- 10.2 To obtain information on whether or not Globiance LT processes your Data, examine your Data retained by Globiance LT, and/or receive a copy thereof;
- 10.3 To provide objections to the processing of your Data if the use of such Data is purely based on legitimate interest(s) of Globiance LT;
- 10.4 To apply for the deletion of your Data, for example if you have withdrawn your consent. The aforementioned right shall not apply if the Data requested for deletion is processed and collected based on legal grounds and is required to be retained by Globiance LT;
- 10.5 To restrict the processing of your Data, for example at the time when Globiance LT assesses whether you have the appropriate right to request the deletion of your Data;
- 10.6 To withdraw your consent for the processing of your Data if the processing takes place on the basis of explicit consent. In such an event the withdrawal of the consent shall not affect the legality of the processing that took place prior to the withdrawal of consent;
- 10.7 To file complaints regarding the use of your Data with the *Lithuanian Data Protection Inspectorate* (<https://vdai.lrv.lt>), if you find that the processing of your Data infringes your rights and/or interests; and
- 10.8 To file complaints and/or submit requests to our designated Data Protection Officer (hereinafter referred to as the “DPO”) via e-mail at [dpo@globiance.com](mailto:dpo@globiance.com).

## **11. Privacy When Using Digital Assets**

- 11.1 Your funding of bitcoin and/or any other Digital Assets, may be recorded on a public blockchain.
- 11.2 Many blockchains are open to forensic analysis, which may lead to the deanonymization and/or unintentional revelation of private financial information – especially when blockchain data is combined with other Data.
- 11.3 Due to blockchains being decentralized and/or third-party networks which are not controlled by Globiance LT, we are unfortunately unable to erase, modify, and/or alter Data from such networks.

## **12. Contact Us**

- 12.1 Please contact us if you have any questions regarding this Privacy Policy and the handling of your Data. We will respond within a reasonable timeframe.
- 12.2 You may contact us via our Support page, email, or at our mailing address below:

**UAB GLOBIANCE LT**  
**Vilnius, EiSiSkiq Sodq 18th st. 11 Lithuania.**  
<https://globiance.com/support/>  
[User-Support@globiance.com](mailto:User-Support@globiance.com)

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