



## **PRIVACY POLICY**

This policy was made by Peak Card Services Limited (registered office: Suites 7B & 8b 50 Town Range Gibraltar; company number: 111314) ("**Peak**"), or in the event any part of this Privacy Policy applies to the electronic money issued for your use, DiPocket UAB (company number: 305599375, headquarters: Upės Street 23, 08128, Vilnius, Lithuania) ("**Issuer**"), (together "**we**", "**us**", or "**our**" as applicable) and it governs your use of PeakWallet, a mobile app software ("**App**") and any website, including but not limited to www.peakwallet.com ("**Webapp**"), where we provide products, services, content, or functions to you ("**Services**").

Please read this policy carefully before using the App and the Webapp.

### **1. The data controller**

We are the data controller of the personal data provided by you. You can contact Us primarily via the contact details provided in the App or the Webapp.

### **2. Personal data**

- 2.1. Personal data is information you give us about yourself by filling in forms on the App and/or the Webapp, or by corresponding with us.
- 2.2. Personal data may include your name, address, date and place of birth, nationality, mother's maiden name, e-mail address, phone number, username, financial details of your bank account, identification document numbers, information made available via copies of identification documents (for example, passport, driving licence or utility bill) and photo.

### **3. The purpose of controlling your personal data**

The purpose of controlling your personal data is to ensure that you are eligible to use the Services. Your personal data is controlled to provide you the Services securely, including for identity verification determined by law as well as for communication.

### **4. Lawfulness of controlling**

- 4.1. The legal basis of our data controlling is your own consent.
- 4.2. If you give us personal data of other people, you confirm that (i) you know they agree to our holding and use of that data or that you are otherwise allowed to give us this information and consent on their behalf to our holding and use of it, as well as (ii) you provided such other people with all the information regarding the processing of personal data.

### **5. Data processing**

- 5.1. We keep your personal data confidential, but we may share it with other entities (who, according to the GDPR, are also bound to keep it secure and confidential) if we have a duty to disclose it, if it is required for the provision of the Services to you.
- 5.2. We will never pass your personal information to a third party for direct marketing purposes without your consent.
- 5.3. To the extent where it is necessary for the provision of the Services, we may share your personal data with:



- (a) companies in the same group as Us;
- (b) the sub-contactors of Us, including payment-processing service providers;
- (c) anyone to whom We may transfer its rights and obligations related to providing the Services after a restructure, sale or acquisition of Us, provided that these entities use your personal data for the same purposes as it was originally given to Us;
- (d) fraud prevention agencies (in particular, we will always tell fraud prevention agencies if you give us false information to prevent and detect fraud, money laundering or other crimes).

5.4. If we are sharing your personal data with organisations in another country (including outside of the EEA), we will ensure they agree to apply adequate levels of protection. If this is not possible – for example because we are required by law to disclose the personal data – we will ensure the transfer of the data is lawful.

## 6. Storage period

We may retain your information for as long as your account is active or as needed to provide you the Services.

If you cancel or we decline your registration or you decide not to go ahead with it, we will keep the Personal Information for as long as we are allowed to under applicable law and for legitimate business purposes, to help prevent fraud and other financial crime, and for other legal and regulatory reasons:

- According to law on the prevention of money laundering and terrorist financing of Republic of Lithuania, register data, copies of your identity documents, the identity data of the beneficial owner, the identity data of the beneficiary, direct video streaming/direct video broadcasting recordings, other data received at the time of establishing your identity, and account and/or agreement documentation (originals of the documents), and the documents confirming a monetary operation or transaction and data or other legally binding documents and data related to the execution of monetary operations or conclusion of transactions shall be stored for eight years from the date of termination of transactions or business relationships with you;
- According to law on the prevention of money laundering and terrorist financing of Republic of Lithuania, correspondence with you shall be stored for five years from the date of termination of transactions or business relationships with you;
- Time limits for storage may be additionally extended for up to two years upon a reasoned instruction of a competent authority.

If the Personal Information is no longer required for the above mentioned reasons, we will delete it.

## 7. Your rights and obligations

7.1. To comply with the law and for your own security, it is essential that you keep us informed of changes to your personal data.

7.2. In accordance with the GDPR, you have the following rights:

- (a) Request information about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- (b) Request correction of the personal information that we hold about you.



- (c) Request deletion of your personal information. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- (d) Object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- (e) Object to automated decision-making including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- (f) Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- (g) Request transfer of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- (h) Withdraw consent. Once you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so by law.

## 8. Remedies

If you think that We violated any of your abovementioned rights, you can do by contacting:

- the Gibraltar Regulatory Authority:
  - 2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar, email: [info@gra.gi](mailto:info@gra.gi)
- or the Bank of Lithuania:
  - Disputes. Application may be provided in three ways: 1) via the electronic dispute resolution tool E-Government Gateway; 2) by completing a consumer’s application form and sending it to the Supervision Service of the Bank of Lithuania, Žalgirio g. 90, LT-09303 Vilnius, email [pt@lb.lt](mailto:pt@lb.lt); 3) submitting a free-form application to the Supervision Service of the Bank of Lithuania, Žalgirio g. 90, LT-09303 Vilnius, email [pt@lb.lt](mailto:pt@lb.lt)
  - More information: <https://www.lb.lt/lt/daugiau-apie-gincius-su-finansiniu-paslaugu-teikeju>;
  - Complaints. Information about the procedure for submission of complaints or requests is available on: <https://www.lb.lt/lt/kontaktai#group-464>. Complaints may be submitted to the Bank of Lithuania by post or email to either of the following addresses: Totorių g. 4, LT-01121 Vilnius, [info@lb.lt](mailto:info@lb.lt), or Žalgirio g. 90, LT-09303 Vilnius, email: [pt@lb.lt](mailto:pt@lb.lt).