



# Privacy Policy

*Effective as of 25 January 2021*

*Last update: 25.01.2021*

## I. Why should you read this Privacy Policy?

bonsai strongly believes in the principles of personal data protection as laid down in European law. It recognizes the importance of safeguarding its users' data. This Privacy Policy describes how we collect, use, process, and disclose your information, including personal information, in conjunction with your access to and use of bonsai services.

If you have concerns about how we use your personal information, you can contact our data protection officer at [dpo@paybonsai.com](mailto:dpo@paybonsai.com).

If you are unsure about the meaning of any term used in this Privacy Policy (such as "bonsai Account" or "bonsai Card"), you may check the definition in the other legal documents regulating the bonsai services to all of which this Privacy Policy is an inseparable part.

## 1.1. About us

When this policy mentions "we," "us," or "our," it refers to **bonsai**<sup>1</sup> that is responsible for your information under this Privacy Policy. The specific responsible entity for your personal data may vary for the different services provided through the bonsai platform. Bonsai is in each case referred to as the "**Data Controller**".

## 1.2. The bonsai services

For the purposes of this document bonsai services consist of products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by us or mobile apps, online platform, official social media platforms, or other online properties through which we provide payment services.

Bonsai services are designed for business purposes and may be used by individuals or entities. In case you are registering for and/or using bonsai services on behalf of a legal entity we will treat you as authorized person and you may be obliged to disclose to us personal data of the legal representatives, the employees, the agents, the beneficial owners or any other third-party related to that legal entity pursuant to the rules described below. You certify that where you have provided information regarding any third person beside yourself you have received prior consent from that other person to provide their personal information to us.

This Privacy Policy grants rights which only natural persons, related in any way to a bonsai client, may benefit from. Whenever we use "you", "your" or similar, the persons which we refer to are the natural persons which are involved in any way with the information of the bonsai client, which may be the representatives, the beneficial owners, the authorized persons or other similar and in case the bonsai Client is a sole trader or similar.

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<sup>1</sup> For the purposes of this document bonsai means bonsai NV, Company number 0663.774.859, registered office address at B-9050 Gentbrugge, Jules Destréelaan 63B.

## DISCLAIMER:

IN CASE BONSAI NV NO LONGER HAS THE RIGHT TO PROVIDE CROSS-BORDER SERVICES IN THE EUROPEAN UNION FOR LEGAL REASONS, IT SHALL CONTINUE TO PROCESS DATA OF ITS EUROPEAN UNION CLIENTS ONLY FOR THE PURPOSES OF COMPLYING WITH REGULATORY RETENTION PERIODS.

ALL CLIENTS, FOR WHICH BONSAI NV HAS ACTED AS A DATA CONTROLLER, IN THE ABSENCE OF THEIR EXPLICIT REFUSAL, SHALL THENCEFORTH BE SERVICED BY ANOTHER LICENSED PAYMENT INSTITUTION AND THEREFORE THAT INSTITUTION SHALL BECOME THE RESPONSIBLE DATA CONTROLLER FOR SAID CLIENTS' DATA.

## II. How do we process your personal information?

### 2.1. What information do we process about you?

You are informed that there are two general categories of information that is collected from you differentiated on grounds as defined by the Regulation 2016/679 ("GDPR) and other applicable data protection national laws.

- a. Information which we collect when you use our payment and financial services.
- b. Information that we collect for other purposes, such as providing you with any of our linked services.

## III. Information that we process in relation to our services.

We may ask for and collect from you the following personal information when you use the bonsai services:

Type of personal data	Purpose of processing	Legal grounds under GDPR	What third-party processors can we use for this?
Names (First Name, Surname, Last Name)	Opening your account and maintaining our legal relationships	Our contract with you or to take steps prior to entering a contract; defence of our legal claims	Our auditors; legal or other similar counsels; debt collection agencies; accounting outsourcing providers; support outsourcing providers including our distributors
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers including our distributors
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form
	Facilitating our social features	Our legitimate interests in developing the Platform and drive user interaction	Other users of the services
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions that we have contracted to enable us to provide effectively bonsai services to our customers; auditors; legal or other similar counsels; regulators
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators

	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Date and place of birth</b>	Opening your account and maintaining our legal relationships	Our contract with you or to take steps prior to entering a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers including our distributors
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers including our distributors
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions that we have contracted to enable us to provide effectively bonsai services to our customers; auditors; legal or other similar counsels; regulators
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing

			providers; legal or other similar counsels; regulators
Phone number	Opening your account and maintaining our legal relationships	Our contract with you or to take steps prior to entering into a contract	Legal or other similar counsels; support outsourcing providers including our distributors
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Performance our contract	Support outsourcing providers including our distributors
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form
	Facilitating login to our platform	Our contract with you	None
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers including our distributors
	Communicating important messages regarding the Service	Compliance with legal obligations	Communication service providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators

	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defence of our legal claims	lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
<b>Nationality</b>	Opening your account and maintaining our legal relationships	Our contract with you or to take steps prior to entering into a contract	Our auditors; legal or other similar counsels; accounting outsourcing providers; support outsourcing providers including our distributors
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Email</b>	Opening your account and maintaining our legal relationships	Our contract with you or to take steps prior to entering into a contract;	Legal or other similar counsels; support outsourcing providers including our distributors
	Marketing	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers including our distributors
	Cross-sales marketing	Your consent	In case there is a third-party processor, you will be provided with information about them in the consent form

	Facilitating login to our platform	Our contract with you	None
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Communicating important messages regarding the Service	Compliance with legal obligations	Communication service providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defence of our legal claims	lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
<b>Registered address</b>	Opening your account and maintaining our legal relationships	Our contract with you or in order to take steps prior to entering into a contract; defence of our legal claims	Our auditors; legal or other similar counsels; debt collection agencies; accounting outsourcing providers; support outsourcing providers including our distributors; competent authorities
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; regulators



	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Official ID Document, type of ID and all data contained in it</b>	Opening your account and maintaining our legal relationships	Our contract with you or to take steps prior to entering into a contract; defence of our legal claims	Our auditors; legal or other similar counsels; debt collection agencies; accounting outsourcing providers; support outsourcing providers including our distributors; competent authorities
	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Facilitating your payment transactions	Compliance with legal obligations; Our contract with you	Correspondent banks; financial institutions of your payee; top-up providers; auditors; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Identity Verification Information (recordings of your video call (if applicable) with our staff and/or verification selfie; photographs of the user registering for bonsai Service; photographs of a passport or of the front and rear sides of any other official ID document – yours or the document of</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators.
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators

the person, who is opening the account)			
Information about your tax status	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Source of income, annual estimate over the account, business activity details	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Marketing	Legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
Turnover	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Marketing	Legitimate interests	Marketing services providers; marketing consultants; SEO and other similar

			software or consultancy providers; other similar providers
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Device ID and log data</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; regulators
	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers including our distributors
	Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity	Legitimate interests	Support outsourcing providers including our distributors; software outsourcing providers; legal or other similar counsels; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
	Facilitating use of our platform	Our contract with you	None
<b>Location</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators

<b>Login credentials</b>	Customer authentication	Compliance with legal obligations	None
	Facilitating use of our platform	Our contract with you	None
	Providing support	Our contract with you	Support outsourcing providers including our distributors
<b>Contact list</b>	Providing you with an easy way to access certain features of the bonsai, like sending payment requests or payment links with bonsai Service	Your consent	None
<b>Data, collected in relation to interactions with our App</b>	Facilitating use of our platform	Our contract with you	None
	Personalize, Measure, and Improve our Advertising and Marketing	Our legitimate interests	Marketing services providers
	Operate, protect, improve, and optimize the bonsai Service and your experience, such as by performing analytics and conducting research	Our legitimate interests	Marketing services providers
	Providing support	Our contract with you	Support outsourcing providers including our distributors
	Providing support	Our contract with you	Support outsourcing providers including our distributors

<b>Data, collected in relation to interactions with our support team</b>	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Data, collected in relation to interactions with our Social media channels</b>	Personalize, Measure, and Improve our Advertising and Marketing; Review and use of public comments and opinions made on social networking sites (e.g. Facebook and Twitter) to better understand our customers and our provision and development of bonsai services	Our legitimate interests	Marketing services providers; marketing consultants; SEO and other similar software or consultancy providers; other similar providers
<b>Data, provided in relation to participations in games, quizzes and completion of questionnaire or a contest entry form for promotional campaigns</b>	Provide you with the option to participate in the respective event	Your consent	Marketing services providers
	Personalize, Measure, and Improve our Advertising and Marketing	Your consent	Marketing services providers
<b>Geolocation (only if activated by you in the mobile app)</b>	Customer authentication	Compliance with legal obligations	Communication service providers; legal or other similar counsels; support outsourcing providers including our distributors; regulators
	Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking bonsai Service or by applying other fraud prevention measures	Legal obligations	Software outsourcing providers; compliance outsourcing providers; PEN test and other similar auditors; PCI DSS auditors; legal counsels; other similar consultants
	Providing you location-based services	Your consent	Support outsourcing providers including our distributors

	Risk and compliance analysis and action	Compliance with legal obligations.	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Usage Information</b>	Collection of crash reports and other statistical information	Our legitimate interest	Support outsourcing providers including our distributors
<b>Delivery address</b>	Delivering of products/documents, such as POS terminals; Marketing	Our contract with you	Competent Authorities, Auditors, Law Firms, Courier Companies
<b>Proof of address or other verification data, which we may request depending on your situation</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Shareholding information in your organisation</b>	Due diligence	Compliance with legal obligations	Our auditors; legal or other similar counsels; compliance outsourcing providers; regulators
	Risk and compliance analysis and action	Compliance with legal obligations	Blacklist and/or sanction list database providers; compliance and risk outsourcing providers; legal or other similar counsels; regulators
<b>Payment Transaction and other Account data, use of</b>	Initiate a payment, send, or request money, acceptance of card payment, funding transaction of your bonsai account	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers

our e-money and payment service			including our distributors; legal counsels; our auditors; regulators
	Authenticate your access to your bonsai Account or your payment instrument	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers including our distributors; legal counsels; our auditors; regulators
	Communicate with you about your bonsai Account and payment instruments	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers including our distributors; legal counsels; our auditors; regulators
	Create an account connection between your Account and a third-party account or platform, if applicable	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers including our distributors; legal counsels; our auditors; regulators
	Perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes	Legitimate interests and in some situations – legal obligation	Credit bureaus; database operators; legal consultants; regulators
	Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking bonsai services or by applying other fraud prevention measures	Legal obligations	Software outsourcing providers; compliance outsourcing providers; PEN test and other similar auditors; PCI DSS auditors; legal counsels; other similar consultants

	Enforce our legal claims arising from any chargebacks, negative balance or similar obligation towards us	Exercise or defence of our legal claims	lawyers; debt collection agencies; competent courts, arbitration tribunals and similar
<b>Specific client identifiers, and, where applicable, other data such as registered address for a particular service and other similar</b>	Initiate a payment, send or request money, acceptance of card payments, top-up, payments toward specific merchants or entities	Our contract with you	Other participants in your transactions and their financial institutions; correspondent banks; payment scheme operators; support outsourcing providers including our distributors; legal counsels; our auditors; top-up providers; specific merchants or entities; regulators
Cookies and other tracking technologies	The use of cookies and other tracking technologies is described in our <a href="#">Cookie Policy</a>		

#### IV. Specific data sharing.

In any case, we may share any of your information for specific reasons, outlined below:

1. With other members of the bonsai corporate family, when and if bonsai NV extends to other companies that are related by common ownership or control, so that we may provide the services you have requested or authorized or to manage the risk, or to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements and to help us manage the availability and connectivity of bonsai services and communications.
2. With our distributors: We may share information related to you or your company with our distributors, which help us to provide you with the best bonsai experience. Our distributors may help us in onboarding you or your company, with your transactions, for which they may process some of your personal information.



**3. Aggregated Data.** We may also share aggregated information (information about our users that we combine so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

**4. With our legal counsels for the purposes of protecting our legal rights.** We may share any information which is necessary to protect our legal rights to legal counsels or similar parties.

**5. Monitoring.** We may monitor or record telephone calls, emails, web chat or other communications with you for regulatory, security, customer services or training purposes. When visiting our offices, CCTV, access control systems and/or other monitoring systems may be in operation.

**6. Business Transfers.** If any of the companies that provides bonsai services is involved in any merger, acquisition, reorganization, sale of assets, transfer of portfolio, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). However, in this event, we will notify you before your personal information is transferred to a different legal person and/or becomes subject to a different privacy policy.

## V. Decisions based solely on automated processing.

Sometimes, our systems may take decisions based solely on automated processing. This does not mean that we will always use automated decision making for these processing activities. In case you believe that you have been unfairly treated by our automated decision-making systems you may ask that a person reviews the decision by contacting us as described in the "How do I complain?" section. Such decisions may be done for processing activities that include:

Processing activity	Automated processing logic

<p>Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking bonsai services or by applying other fraud prevention measures.</p>	<p>Our fraud-prevention and monitoring systems may sometimes take automated decisions in regard to suspicious behaviour. For example, we may block a certain transaction which was made in a remote part of the world just a few minutes after your last login from your home country.</p>
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## VI. Information collected about you from third parties.

We may ask certain entities for information about you when you are enrolling for our services. Such entities are generally fraud prevention agencies and Know Your Customer and Anti Money Laundering Check-up service providers which help us to fulfil our legal obligations for due diligence on our customers.

We may also collect information about you from public sources for Anti Money Laundering reasons or market research. This includes:

- a. Official public records, like your national Company register.
- b. Information published by the press or on social media.

In case you use any of the linked services, if any are provided by one of our partners at a given moment in time, such as insurance services, they may share details with us about your deal.

## VII. Data Retention and Erasure.

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our regulatory obligations. If you no longer want us to use your information to provide bonsai services to you, you can request that we erase your personal information and close your bonsai membership, providing your account is in good standing, not blocked or somehow limited for compliance, risk or regulatory reasons, or due to your outstanding obligation

to us, court order, pledge or order by another regulator or other reason which prevent us by law to close your account or terminate the services. In case the Data Controller is a regulated financial institution, such as credit institution, payment or e-money institution or similar, such Data Controller is obliged under Payment Services Directives and Anti Money Laundering laws to keep your personal information and all transactions history for a period of 10 years after the termination of the relation with you. Please note that if you request the erasure of your personal information: We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing security. For example, if we suspend a bonsai membership for fraud or safety reasons, we may retain certain information to prevent that client from opening a new bonsai membership in the future. We are also obliged to retain personal data which we have collected for the purposes of complying with the relevant anti-money laundering and anti-terrorism financing for a period as defined under applicable laws.

We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, bonsai may keep some of your information for tax, legal reporting and auditing obligations.

Because we maintain our records in a manner protecting from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period.

## VIII. Your rights.

You may exercise any of the rights described in this section before the respective Data Controller pursuant to the Legal Agreements by sending an email from your e-mail registered for bonsai services to the respective Company providing the services. Please note that we may ask you to verify your identity before taking further action on your request. Please note also that upon receipt of your e-mail we shall try our best to provide you with the requested information and resolve your request in reasonable time, subject to all obligations which we or the related companies have under the applicable laws.

### 8.1. Managing Your Information.

You have the right to obtain the following:

- Confirmation of whether and where we are processing your personal data.
- Information about the purposes of the processing.
- Information about the categories of data being processed.
- Information about the categories of recipients with whom the data may be shared.
- Information about the period for which the data will be stored (or the criteria used to determine that period).
- Information about the existence of the rights to erasure, to rectification, to restriction of processing and to object to processing.
- Information about the existence of the right to complain to any Regulator.
- Where the data was not collected from you, information as to the source of the data; and
- Information about the existence of, and an explanation of the logic involved in, any automated processing.
- Additionally, you may request a copy of the personal data being processed.

## **8.2. Rectification of Inaccurate or Incomplete Information.**

You have the right to ask us to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself via your online access to bonsai membership).

## **8.3. Data Access and Portability.**

You have the right to:

- Receive a copy of your personal data in a structured, commonly used, machine-readable format that supports re-use.
- Transfer your personal data from one controller to another.
- Store your personal data for further personal use on a private device; and
- Have your personal data transmitted directly between controllers without hindrance.

In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us.

To protect the bonsai database from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period.

#### **8.4. Withdrawing Consent and Restriction of Processing.**

Where you have provided your consent to the processing of your personal information by us you may withdraw your consent at any time by changing your Account settings or by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

#### **8.5. Objection to Processing.**

In some jurisdictions, applicable law may entitle you to require us not to process your personal information for certain specific purposes (including profiling for marketing purposes) where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing, or such processing is required for the establishment, exercise or defence of legal claims. Please note that Data Controllers which are regulated financial institutions, such as credit institutions, payment or e-money institutions or similar are obliged under Anti Money Laundering laws to make risk profiling of their customers upon opening of the relationship and constantly during the relationship and this is a legitimate reason. In case you do not wish us to process your

personal data for certain specific purposes, which are legitimate purposes to us, you shall have to close your membership or we may have to stop providing you some or all of the services.

## Opting out

You can ask us to stop sending you marketing messages at any time by contacting us.

Please bear in mind that irrespective of your opt-out, related to marketing messages, you will still continue to receive specific messages, which we are required to send you under the applicable legislation, insofar as you still have a legal relationship with us.

## 8.6. How do I complain?

You should in first place try to resolve the matter by sending an e-mail **to the respective Data Controller** under this Privacy Policy from your registered e-mail for the Service:

Where the responsible Data Controller (as outlined in the introduction of the Privacy Policy) is specified to be bonsai NV you may contact us at:

Data Protection Officer (DPO):

[dpo@bonsai.com](mailto:dpo@bonsai.com)

bonsai NV, B-9050 Gentbrugge, Jules Destréelaan 63B

**Competent Regulator.** In case you are not satisfied with the reply or resolution of the respective Data Controller, you have the right to lodge complaints about the data processing activities carried out by us before the competent data protection supervisory authorities as described below.

If the Data Controller responsible for the respective data processing, subject to your complaint, is bonsai NV you have the right to file a complaint with its lead supervisory authority, the Belgian Data Protection Authority: <https://www.dataprotectionauthority.be/citizen>.

## IX. International transfers.

### 9.1. Adequacy Decisions.

Where we disclose any of your collected personal information outside EEA, we shall comply with any relevant adequacy decision, where possible.

### 9.2. Other Means to Ensure an Adequate Level of Data Protection.

In case personal information is shared with corporate affiliates or third-party service providers outside the EEA in absence of an adequacy decision, we have – prior to sharing your information with such corporate affiliate or third-party service provider – established the necessary means to ensure an adequate level of data protection and a valid legal ground under the applicable data transfer rules. We will provide further information on the means to ensure an adequate level of data protection on request.

Protection of personal data transferred from or to the United Kingdom of Great Britain and Northern Ireland in the absence of an adequacy decision:

In the absence of an adequacy decision after the United Kingdom of Great Britain and Northern Ireland leaves the European Union, we shall enter into Data processing agreements, including Standard contractual clauses for data transfers between EU and non-EU countries, with our new or existing vendors or similar parties from the United Kingdom of Great Britain and Northern Ireland.

## X. Security.

We take the responsibility to ensure that your personal information is secure, kept in an encrypted form on servers, collocated in Special data centers in Europe. To prevent unauthorized access or disclosure of information we maintain physical, electronic and procedural safeguards that comply with applicable regulations to guard non-public personal information. Once you are logged into your Account, all internet communication is secured using Secure Socket Layer (SSL) technology with High-grade security Encryption. We restrict access to your personally identifiable information only to employees who need to know that information in order to provide products or services to you.

If you know or have reason to believe that your bonsai credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your bonsai membership, please contact us following the instructions in the Contact Us section below. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current.

## XI. Can Children Use Our Services?

Although most of bonsai's products are designed for use by people of all ages, the app will only show those products that are legally allowed for its user. Furthermore, we do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use bonsai services. Please contact us if you believe that we have mistakenly or unintentionally collected information from an individual under the age of 13.



## XII. Changes to this Privacy Policy.

We reserve the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the bonsai platform. If you disagree with the revised Privacy Policy, you may cancel your membership. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the bonsai platform will be subject to the revised Privacy Policy.

## XIII. Contact us.

If you have any questions or complaints about this Privacy Policy or our information handling practices, please email us at [dpo@paybonsai.com](mailto:dpo@paybonsai.com)