



**Vita Money**

**Privacy Policy**

## 1. ABOUT US AND THIS POLICY

Vita Money is a company operating in the remittances business, headquartered in France, and conducting transactions with countries worldwide. Collaborating with various partners, our sole objective is to streamline your transactions and simplify your life.

This policy extends to all platforms utilized by Vita Money, whether web-based or application-based. Alongside this policy, Vita Money has established a comprehensive and meticulously structured compliance framework to safeguard the interests of both the company and its customers. Consequently, any additional concerns not addressed within this document should be referred to the relevant sections of the compliance documents.

## 2. THE DATA WE COLLECT

The data Vita Money collects from its customers depends on the interaction type and the product the customer intends to use. Additionally, it must be stated that when a referring to "personal data" or "personal information" is made, it means that any information pertaining to an individual.

This Policy also depicts, as shown below, the types of information Vita Money collects from its customers:

**Basic Identifying Information:** This type of information could include full name, postal address, email address, phone number, date of birth, gender and profession. Additionally, social username or similar identifiers can be asked.

**Customer Support Information:** The information provided by the customer contacting the customer services, e.g. including call recordings.

**Government Issued Identification or Records:** This type of document can be exemplified as driver's license, passport, military, visas or national cards. Conversely, it also can be deemed as the Selfie ID procedure adopted by Vita Money where the customer is obliged to provide a recording with his identification document next to his face to prove the similarity.

Furthermore, documentation such as Proof of Address or utility bill also are encompassed by this category.

**Marketing & Communications Information:** Concerning marketing collected data, it can be characterized as the customers preferences for receiving marketing communications from Vita Money and our third parties, communication preferences, and information lawfully obtained from market research, advertising networks, or analytics providers.

**Payment Information:** Payment Information covers the customer's financial or payment instrument details, such as debit and credit card, or bank account details.

**Promotions & Competitions Information:** Vita Money, when conducting promotions or competitions, will utilize your name, email and any other personal information required for participation for such events.

**Beneficiary Information:** This topic encompasses the beneficiary's full name, postal address, phone number, and depending on the disbursement method selected, certain financial institution or account details such as bank account or mobile wallet account.

**Referral Information:** Information provided by the customer about the beneficiary, such as name and email address, to introduce them to our services.

**Sensitive Personal Data:** Sensitive Personal Data can be deemed as the biometric data, particularly face scan information from photos and videos provided for identity verification purposes, and monitoring of login activity and interactions with our site to safeguard the customer's account and identify suspicious or fraudulent activity.

**Survey & Feedback Information:** Survey and feedback information includes the customer's name, email address, or other contact information, along with responses to surveys, reviews, feedback, testimonials, and any other personal information requested.

**Technical Information:** This comprises details about the hardware and software Vita Money's customers use to access our services, network information, internet service provider, operating system, browser type, unique device identifiers, IP address, other similar unique identifiers, and your current location, using GPS technology.

**Transaction Information:** Vita Money keeps the customers history/logs, transaction receipts, purpose of transfers, relationship with the beneficiary, average transaction amount, frequency of use of our services, intention to send to multiple recipients, and referral rewards.

**Usage Information:** This includes details of the customers interactions with Vita Money's services or sites, as well as browsing or search activity.

### **3. VITA MONEY COLLECTING DATA**

Vita Money collects personal data directly from the customer when the customer engages with Vita Money's services, including creating a profile, contacting the Company via chat, participating in surveys, interacting at events, entering sweepstakes or promotions, posting reviews, or subscribing to receive emails, text messages, or postal mailings.

Additionally, when the customer visits Vita Money's websites, uses its app, opens or clicks on emails, or engages with Vita Money's advertisements, Vita Money or Vita Money's third-party partners automatically gather certain information through technologies such as cookies, web beacons, and pixels.

Furthermore, Vita Money may obtain data about the customer from external sources, including data analytics providers, marketing or advertising services, social media platforms, fraud prevention services, credit reporting agencies, vendors providing services on Vita Money's behalf, or publicly available sources. For more information, please refer to Vita Money's Cookie Policy.

#### **4. VITA MONEY PROCESSING DATA**

Vita Money will only use the customer's personal data when the law allows it. Depending on the country in which the customer is located, Vita Money relies on the following legal bases to process personal data:

**Compliance with Legal Obligations:** Vita Money uses personal data to comply with legal or regulatory obligations, to establish or exercise rights, and to defend against legal claims. This includes security and fraud prevention measures to detect, investigate, prevent, or take action regarding malicious, deceptive, fraudulent, or illegal activity.

**Performance of a Contract:** Vita Money uses personal data to provide services, process transactions, maintain accounts, and communicate with customers regarding requests, inquiries, issues, or feedback.

**Consent or Legitimate Interest:** Vita Money uses personal data for marketing and promotional purposes, analytics and personalization, and other business or commercial purposes with the customer's consent or legitimate interest.

##### **4.1 Vita Money Processing Sensitive Data**

Vita Money may request specific consent from the customer for the collection, use, and storage of biometric data during the verification process, as required by privacy regulations in the customer's jurisdiction. If consent is not provided, alternative methods for identity verification may be offered, though these may take longer. Vita Money will not disclose or

share any biometric data with anyone other than its identity verification providers, unless required by applicable laws and regulations or pursuant to a valid court order.

## 5. VITA MONEY SHARING DATA

In addition to the specific situations discussed elsewhere in this privacy policy, Vita Money discloses personal data in the following circumstances:

**Corporate Affiliates:** Personal data may be shared with Vita Money's corporate affiliates, including its parent company, affiliates, and subsidiaries. These affiliates process personal data on Vita Money's behalf to provide services or with the customer's consent or as permitted or required by law.

**Service Providers:** Certain personal data is shared with third parties that support Vita Money's core business functions and internal operations. This includes banks, disbursement providers, financial institutions processing transfers, identity verification or KYC service providers, and third parties providing software tools for communication, marketing assistance, fraud investigation, customer surveys, and customer service outsourcing.

**Third-Party Partners:** Personal data may be shared with third parties with whom Vita Money has partnered to create and offer products, services, or joint promotions. Additionally, personal data may be shared with banking or distribution partners in case of suspected violations of terms or fraudulent behavior.

**Social Media Platforms and Networks:** Some of Vita Money's websites feature plugins, widgets, or tools provided by third parties, resulting in the collection or sharing of information between Vita Money and the third party. Their use of the customer's information is governed by their respective privacy policies.

**Business Transactions:** In the event of a merger, corporate transaction, or transfer of business assets, customer information may be shared with involved business entities or individuals.

**Legal Process:** Vita Money may disclose personal data in response to subpoenas, court orders, government inquiries, or to comply with laws and regulations. This includes disclosures to establish, exercise, or protect rights; defend against legal claims; ensure visitor safety and security; detect and prevent fraud; and address illegal activities or policy violations.

**Other Instances:** Vita Money may inquire if the customer would like their information shared with other third parties not described elsewhere in this policy.

## 6. CUSTOMER'S RIGHTS

Vita Money's customers in certain regions of the world are entitled to specific data privacy rights under applicable privacy legislation, including but not limited to the laws of the Kingdom of Belgium. Vita Money endeavors to implement the best privacy practices as a standard for all customers. These rights include:

**Access Your Data & Data Portability:** Customers may request a copy of their personal data held by Vita Money, provided without undue delay, subject to certain exceptions or limitations.

**Correct Your Data / Data Rectification:** Customers have the right to request updates and corrections to inaccuracies in their personal data. They can update certain information related to their account by logging in or contacting Vita Money.

**Data Deletion/Erasure:** Customers may request the erasure of their personal data, subject to applicable law. If an account is closed, certain information will be retained for a period to deter fraud and comply with legal obligations.

**Restrict Processing of Data Requests:** Customers have the right to request restrictions or object to the processing or transfer of their personal data under certain circumstances.

**Unsubscribe from Direct Marketing:** Customers have the right to opt-out of processing their personal information for marketing purposes at any time. They can exercise this right by clicking on the 'unsubscribe' link in promotional emails.

**Automated Individual Decision-Making, Including Profiling:** In some jurisdictions, customers have the right not to be subject to decisions based solely on automated processing of personal data. Exceptions may apply under relevant data protection laws.

**Withdraw Your Consent:** Customers have the right to withdraw consent for Vita Money to process their data, where lawful processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing prior to withdrawal.

To exercise these privacy rights, customers can submit a request via email to [service.clients@vitamoney.fr](mailto:service.clients@vitamoney.fr) or contact Vita Money via chat or phone. Identity verification may be required for processing certain requests, and customers may be contacted by phone or email for verification purposes.

## **7. HOW VITA MONEY PROTECT THE CUSTOMERS DATA**

Vita Money employs industry-accepted standards to protect the information customers submit. Data encryption technology is implemented to safeguard sensitive data such as bank account numbers, credit card numbers, dates of birth, and government identification numbers transmitted through the site and/or app.

Additionally, security credentials, like usernames and passwords, are required for accessing information on the site and/or app. Customers are responsible for maintaining the confidentiality and security of their security credentials.

If access to Vita Money's services is allowed via fingerprint on a device (e.g., Apple Touch ID), customers should not register any other person's fingerprint on that device to prevent unauthorized access. While efforts are made to ensure security, no method of transmission over the Internet or electronic storage is 100% secure.

Therefore, Vita Money cannot guarantee absolute security, and any transmission of personal information is at the customer's own risk. For security-related inquiries, customers can contact Vita Money at: [service.clients@vitamoney.fr](mailto:service.clients@vitamoney.fr)

## **8. VITA MONEY'S DATA RETENTION**

Vita Money will retain customer personal data only for as long as necessary to fulfill the purposes for which it was collected, including legal, accounting, or reporting requirements. To determine the appropriate retention period, considerations are made based on the customer's country of residence, among other factors: Legal and regulatory obligations or retention periods imposed by applicable laws and regulators; The quantity, nature, and sensitivity of the personal data; Potential risks of unauthorized use or disclosure of personal data; Purposes for processing personal data and alternative means to achieve those purposes.

As a regulated financial institution, Vita Money is mandated by law to retain certain personal and transactional data even after account closure. Customers explicitly agree to Vita Money retaining their personal data, including transaction-related and identity verification data, for at least 10 years following the termination of the legal relationship.

## **9. CHANGES OF THIS POLICY**

Vita Money reserves the right to amend this Policy at any time, and any changes will be communicated by posting a revised version on our Site and App. The Company encourages the customer to review this Policy each time he is engaging in a transaction, as it may have been updated since the customer's initial registration or last transaction. If the customers disagree with any aspect of this Policy or any changes made, he has the option to terminate

your agreement with Vita Money and close his profile by emailing Vita Money at: [service.clients@vitamoney.fr](mailto:service.clients@vitamoney.fr).

## **10. CONTACT AND COMPLAIN**

If you have any questions, concerns, or complaints regarding the processing of your personal data, you may contact us at:

Vita Money  
138 boulevard  
Voltaire, 75011, Paris  
[service.clients@vitamoney.fr](mailto:service.clients@vitamoney.fr)  
[ney.fr](mailto:service.clients@vitamoney.fr)  
+33189706289

We will address your concerns promptly and in compliance with applicable legal requirements. If you are not satisfied with our response, you have the right to lodge a complaint with the Belgian Data Protection Authority:

### **Commission nationale de l'informatique et des libertés**

3 Place de Fontenoy  
TSA 80715  
75334 PARIS CEDEX 07  
FRANCE  
+33 (0)1.53.73.22.22

## **11. LEGAL BASIS**

We process your personal data based on one or more of the following legal grounds, as defined by the General Data Protection Regulation:

- a) Contractual Necessity: Processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract.
- b) Legal Obligation: Processing is necessary for compliance with a legal obligation to which we are subject as a financial institution.
- c) Legitimate Interests: Processing is necessary for the purposes of our legitimate interests, provided these are not overridden by your interests or fundamental rights and freedoms.
- d) Consent: Where you have provided explicit consent for specific processing activities on the context of financial services and marketing, you may withdraw your consent at any time by contacting us.