

PRIVACY POLICY

Last updated: July 5th 2019

This Privacy Policy ("Policy") governs processing by WELL CASH ("WELL CASH", "we", "us") of information, including personal data, relating to the data subjects ("you", "User") of the well-cash.com website ("Site"), WELL CASH mobile app ("App") and other services provided by us, including but not limited to wallet and prepaid card services (collectively hereinafter "Service"). This Policy applies to the Site, App, all products and Services offered by us.

WELL CASH is a trademark, that belongs to the HAMRICK LTD.
HAMRICK LTD. is a UK based company, company number 155910.
Company address: Alpha House, 100 Borough Street, London, SE1 1LB, UK.

The Policy covers following questions:

- Information we may process, legal basis and purposes of processing
- How we use information
- How long we retain information
- How we share collected information
- Cross-border transfer
- How we store and protect collected information
- Rights of users
- Changes to the Policy
- Contacts

1. Information Processing, Legal Basis and Purposes of Processing

Personal information

We may process personal information of Users in a variety of ways, including, but not limited to, when users visit our Site, App, or use any of our Services; register on the Service; fill out any form; provide information for passing of anti-money laundering procedures or take any actions directly stipulated by the features of the Site or App.

We may obtain information about you from third party sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms for purposes of verifying your identity. We obtain information from third parties for the purposes of compliance with legal obligations, such as anti-money laundering laws, and for the purposes of contractual performance.

Categories of data involved in data processing include:

- Personal Identification Information: Name, e-mail, date of birth, citizenship, utility bills, photographs, phone number, mailing address, ID or other documents' number and other details;
- Payment Information: transaction history;
- Other data collected by cookies: see sections 2 and 3 of the Policy regarding cookies.

From time to time, we may process this and additional types of data about Users to make sure our Service is not used fraudulently or for other illicit activities. In such instances, processing is necessary for one of the legal bases as described below. We may ask you to supply additional documents or information where it is necessary for compliance with our legal obligations and for the purposes of legitimate interests e.g. in the prevention of fraud, money laundering and counter-terrorism.

Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Service or related activities. Thus, in some cases, we will be unable to render Services to you if you do not provide us your personal identification information due to the requirements of anti-money laundering laws and other legal acts.

Automatically collected information

We may collect information about Users whenever they interact with our Service, for example, through the use of cookies. Such information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as IP address, location, date and time of connection, the operating system and the Internet service providers utilized and other similar information.

Web browser cookies

Our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly. Learn more about the way our Site may use cookies in our Cookie Policy.

2. Using the Information

We process aforementioned information relying on the following legal grounds:

- where it is necessary to perform a contract with you for the provision of our Services or to enter into a contract with you for the provision of our Services;
- where it is necessary for compliance with our legal obligations across jurisdictions with regard to provision of financial services, as stipulated by accounting, taxation and other laws and to prevent criminal activity, fraud and money laundering;
- where it is necessary for the purposes of our legitimate interests to prevent fraud, money laundering or unauthorized use of your account, and to analyze your account activity in order to be able to provide you with an adequate and reliable service and to offer you the best possible options suitable for your needs;
- where we have received your explicit consent as required by applicable law.

and for the following purposes:

- to identify you as a client and distinguish you from other users of our Service;
- to be able to continuously provide you with functional, secure, efficient, and customized service;
- to operate and develop our Service;
- to publish content and advertising on the Site and App;
- to prevent losses and frauds;
- to respond to you about any comment or enquiry you have submitted;
- to comply with legal and regulatory requirements, including Know-Your-Customer (KYC) anti-money laundering (AML) requirements;
- to provide you with customer and technical support;
- to inform you about our and our partner's offers, products and to perform other marketing activity where we have received your consent.

We also may process personal information including your email address to send you service updates and notifications (regarding your account settings), newsletters, marketing messages and certain email notifications where we have obtained your explicit consent or are otherwise lawfully permitted to do so. You can change your preferences later and opt-out from such emails at any time just by following the link, which may be placed in every email from WELL CASH or through settings.

We will ask User's consent before processing of aforementioned information in other purposes. When collecting such consents, we inform the Data Subject of the respective purposes of processing and such processing is conducted only when appropriate consent is received.

3. Retention of Collected Information

We store collected information for as long as it is necessary to perform our contractual obligations in order to provide products and services to you. If you decide to delete your account, do not use Services and choose to terminate contract with us, we keep your information and information on your transactions for 5 years after you delete your account for the compliance with the requirements of anti-money laundering laws and other legal acts. However, the information may be, wholly or in, part, retained for longer or shorter term if required by applicable laws or if there is other justified reason to retain or delete them.

In some cases, we can keep your information longer than 5 years: such exceeding can be used only in a case of arising of legal requirements that will oblige us to store your information for more than 5 years. Information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide products and services.

Please note that retention periods may be changed from time to time based on legal and regulatory requirements.

4. Sharing of Collected Information

We sometimes need to share personal information we process with third parties. When necessary or required we may share information with authorities, other companies within the group of companies for internal administrative purposes, companies which the group cooperates with and to other third parties, such as third party service providers used in connection with our Services (e.g. various analytical services and financial institutions that we have partnered with to jointly create and offer a product). The legal basis for data transfer is performance of contract between you and us, as well as our legitimate interest and our legal obligation.

We may share collected information with:

- credit reference agencies;
- KYC providers;
- debt collection and tracing agencies and other companies in the same group;
- suppliers and services providers (analytical, financial);
- government bodies and other recipients in order to comply with applicable law;
- courts and tribunals.

5. Cross-border Transfers

We intend to transfer the collected information we obtain from you to recipients in countries other than the country in which the information has been originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

The collected information may be transferred to a state outside the European Economic Area ("EEA"). For such transfers we use standard contract clauses or other suitable safeguard to permit data transfers from the EEA to other countries.

6. Protection of Collected Information

We adopt appropriate data collection, storage and processing practices and security measures to protect from unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site. We use encryption to protect information and we grant access to information to our employees and third parties only when it is necessary for them to process said information.

However, the transmission of such data over the Internet using personal computers or mobile devices is not completely safe and therefore we cannot guarantee the security of documents submitted to our platform. Any transmission of such documents is at your own risk. As soon as we receive your information, we implement strict security measures and procedures to avoid unauthorized access from any third party.

7. Customers' Rights

You have a right to request from us:

- access to information and update information;

You have a right to review information we keep about you and if you suppose that information is inaccurate or incomplete, you may contact us in order to update information.

Updating your information. If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion or object to its processing, please contact us.

- restriction of processing and erasure of your personal data;

If you believe that we are not entitled to use your information and you want to request its deletion or object to its processing, you may contact us.

- personal data in a structured, commonly used and machine-readable format.

Please note that the above is subject to limitations by relevant data protection laws. You may exercise the aforementioned rights by sending a request to e-mail address provided in the Contacts section. In your request please provide us with your account login and we will respond you shortly for further discussion

Where the processing is based on consent, you have a right to withdraw such consent at any time. However, we might keep processing information if we have a legal basis for it.

We will not keep outdated or deleted information, unless we have to do so in accordance with legislative requirements.

8. Policy Changes

WELL CASH has the discretion to update this privacy policy at any time. When we do, we revise the updated date at the top of the page. We may also may post a notification on the main page of our Site and notify you by other means (for example, via email). We encourage Users to frequently check the page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy, policy periodically and become aware of modifications.

9. Links

There may be links from our Sites to other sites and resources provided by third parties. This Privacy Policy applies only to our Sites. Accessing those third-party sites or sources requires you to leave our Sites.

We do not control those third party sites or any of the content contained therein and you agree that we are in no way responsible or liable for any of those third party sites, including, without limitation, their content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to or arising from those sites. We encourage you to review all policies, rules, terms and regulations, including the privacy policies, of each site that you visit.

10. Disposal of Collected Information

Once we do not have any obligation to providing you with a service you requested, nor an obligation to hold Personal Information for regulatory or legal purpose, we will anonymise or dispose of your Personal Information in line with acceptable industry and security standards so that this cannot be subsequently retrieved and associated to you.

Where we cannot directly remove such records, such as in archived backups, we will retain a log of which Personal Information should be removed if ever the backup data is restored.

11. Marketing

We will ask you for your consent on registration or post-registration, by providing you the ability to check marketing preferences check boxes located within your account profile page to allow us to contact you or use your Personal Information for marketing purposes. We may also notify our existing Users on our own products or services similar to those we have already provided based on our legitimate interest.

You have the right to retract the consent for us to process your Personal Information for marketing purposes.

12. Data Protection Officer

Our Data Protection Officer is the person in charge of ensuring our company adheres to this Privacy Policy. This person is also the main contact for our Data Protection Supervisory Authority.

13. Fraud, Phishing and Email Scams Disclaimer

Please be notified that WELL CASH is not in any partnership with entities who represent themselves as customer support agents, providing customer support services via phone and/or social media and promise to help solve your issues for money. Remember - customer support is provided only via the WELL CASH website and is always provided free of charge.

If you discovered what you believe is a fraud, phishing, or scam which impersonates WELL CASH, please contact us immediately.

14. Contact Us

If you have any questions, comments, or concerns not specifically regarding our Privacy Policy and/or practices as it or they relate to the Platform, please contact us at the email address.

You may also wish to check our site for Help Centre or for Frequently Asked Questions where a solution may easily be found ready for you.