



CUSTOMER PRIVACY NOTICE
FOR BUSINESS CUSTOMERS
IN THE UK AND EEA
PALADIS FINANCE UAB

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We are committed to protecting and respecting your privacy. We will:

- always keep your personal data safe and private
- never sell your personal data
- allow you to manage your marketing choices at any time

About us

Paladis Finance UAB also in this document know as (“Paladis”), a modern Fintech company, serving both individual and business customers from all over the World; however, the business focus shall initial be in Lithuania and Lichtenstein. Paladis strives to offer its customers a constantly growing ecosystem of value- added services for innovative digital payments: online, at the point of sale and entirely mobile.

The Paladis company providing the relevant product or service to you will be responsible for processing your personal data for that product or service. This Paladis company is known as the ‘controller’ of your personal data.

Why do I need to read this notice?

We will collect your personal data when you use:

- our website at www.paladis.com
- the Paladis Business app
- any of the services available to you through the Paladis Business app or website

We may also collect your personal data from other people or companies. We explain how this can happen in more detail at [What personal data do you collect about me?](#) section below.

When we say ‘personal data’, we mean information which:

- we know about you (for example, if you are a director of a company applying for a Paladis Business account, we may ask you to provide identification documents)
- can be used to personally identify you (for example, a combination of your name

and postal address)

Data protection laws do not apply to information about legal entities (for example, limited liability companies). However, they do apply to people. When we provide Paladis Business products, we process personal data of the individuals authorised to set the account up and give us instructions about the account. We also may process personal data about other employees and customers of the company that receives Paladis Business products.

If more than one person is authorised to give instructions on a Paladis Business account, references in this notice to 'you' and 'your' will mean any, or all, of those people. When we refer to a 'company', we mean the company that holds the Paladis Business account.

This notice explains what personal data we collect, how we use it, and your rights if you want to change how we use your personal data. This notice only applies to personal data. It does not apply to company information.

If you are a customer of a company that holds a Paladis Business account, or one of its employees who uses the company's Paladis Business account, but are not authorised to give us instructions, we do not process personal data about you as a 'controller'. The company that holds the Paladis Business account is the 'controller' of your personal data. You should contact the company that holds the Paladis Business account for information about how it processes your personal data.

We may provide this notice in languages other than English. If there are any discrepancies between other language versions and the English language version, the English language version is authoritative.

If you have concerns about how we use your personal data, you can contact dpo@paladis.com.

What personal data do you collect about me?

The types of personal data we collect depend on how you use Paladis Business. When you use Paladis Business, you can be:

- a freelancer, sole proprietor that has applied for a Paladis Business account, which we call a **'Freelancer'**
- an employer or an employee that is responsible for applying for and / or running a Paladis Business account on behalf of a company, which we call an **'Account Owner'**
- an employee of a company that has a Paladis Business account, and your employer has invited you to use its Paladis Business account, which we call a **'Team Member'**

If you are a:

- Freelancer or Account Owner, we are the 'controller' of your personal data when we provide you with Paladis Business
- Team Member, the company that holds the Paladis Business account you have been invited to use, is a 'controller' of your personal data. Please contact it if you have any questions about how your personal data is processed by Paladis Business on its behalf
- customer of a company that holds a Paladis Business account, that company is a 'controller' of your personal data. Please contact it if you have any questions about how your personal data is processed by Paladis Business on its behalf

The table below explains what personal data we collect and use about you:

Type of personal data	Details
Information you give us	We collect information you provide when you: ✓ fill in any forms ✓ correspond with us ✓ respond to any of our surveys ✓ register to use the Paladis Business app ✓ open a Paladis Business account, are assigned to be an Account Owner or Team Member, or use any of our services ✓ give us access to your, or your company's, other financial accounts (for example, through Open Banking) ✓ take part in online discussions or promotions ✓ speak with a member of our social media or customer support teams (for example, through our social media pages, website, on the phone or through the Paladis Business app) ✓ enter a competition or share information with us on social media ✓ contact us for other reasons We will collect the following information: ✓ your name, address, and date of birth ✓ your email address, phone number and details of the device you use (for example, your phone, computer or tablet) ✓ your registration information ✓ details of the relevant Paladis Business account you are associated with, including the account number, sort code and IBAN ✓ details of your Paladis Business cards (or other cards you have registered with us) including the card number, expiry date and CVC (the last three digits of the number on the back of the card)

	✓ copies of your identification documents (for example, your passport or driving licence) and any other information you provide to prove you are eligible to use our services ✓ your country of residence, tax residency information and tax identification number ✓ records of our discussions, if you contact us or we contact you (including records of phone calls) ✓ your image in photo or video form (where required as part of our Know-Your-Business (KYB) checks, to verify your identity if you contact us when logged out of your Paladis Business account, or where you upload a photo to your Paladis Business account) ✓ information about other people (such as the company's shareholders, directors, employees, customers or business partners) where we are legally required to ask for such information (for example, as part of KYB checks or under anti-money laundering laws to verify your company's sources of funds) Where you, or your company, give us personal data about other people, you are responsible for ensuring that they understand how we will process their personal data.
Information about how you use Paladis Business	When you use Paladis Business, we get information about: ✓ how you use your Paladis Business card ✓ any transactions you make with your Paladis Business card ✓ your device (as explained below)

Information collected from your use of our products and services	Whenever you use our website or the Paladis Business app, we collect the following information: ✓ technical information, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, the browser type and version, the time-zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system and the type of mobile browser you use ✓ information about your visit, including the links you have clicked on, through and from our website or app (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page ✓ information on transactions (for example, payments into and out of your
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	Paladis Business account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction (including merchants' and ATMs' locations), IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received, details of device used to arrange the payment and the payment method used ✓ information stored on your device. The Paladis Business app will regularly collect this information in order to stay up to date (but only if you have given us permission)
Information from your employer	Where a company that holds a Paladis Business account nominates you as an Account Owner, your employer will give us information about you. Typically, this will include your name and business contact details. In some cases, it may also include your employment status, salary details and tax information (for example, if your employer uses Paladis Business to administer its payroll).
Information from others	We collect personal data from third parties, such as credit reference agencies, financial or credit institutions, official registers and databases, as well as fraud prevention agencies and partners who help us to provide our services. This includes your credit record, information about late payments, information to help us check your identity, information about you and information relating to your transactions. We have explained more in the Do you run credit checks on me? section below. When you ask us to, we'll also collect personal data from accounts you, or your company, have with third party financial institutions (when you create a linked account by activating Open Banking in the Paladis Business app).
Information from websites or social media	We may collect information about you if you make it publicly available on websites, social media websites or apps. We only do this as part of our Paladis Business KYB checks.
Information from publicly available sources	We collect, or may ask you to provide, personal data from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches and KYB purposes.

What is your legal basis for using my personal data?

We must have a legal basis (a valid legal reason) for using your personal data. Our legal basis will be one of the following:

- Keeping to our contracts and agreements with you

We need certain personal data to provide our services and cannot provide them without

this personal data.

- Legal obligations

In some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

- **Legitimate interests**

We sometimes collect and use your personal data because we have a legitimate interest to use it and this is reasonable when balanced against your right to privacy.

- **Substantial public interest**

Where we process your personal data, or your sensitive personal data (sometimes known as special category personal data), to adhere to government regulations or guidance.

- **Consent**

Where you've agreed to us collecting your personal data, or your sensitive personal data, for example when you have ticked a box to indicate that you are happy for us to use your personal data in a certain way.

We explain more about how we use your personal data in the [How do you use my personal data?](#) section below.

How do you use my personal data?

Explore the ways in which we may use your personal data using this table:

What we use your personal data for	Our legal basis for using your personal data
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Providing our services If you apply to use a Paladis Business product or service, we will use your personal data to check your identity (as part of our KYB process) and decide whether or not to approve your application. We use your personal data to: - meet our contractual and legal obligations relating to any Paladis Business products or services you use (for example making payments into and out of your Paladis Business account) - help you understand your, or your company's, Paladis Business spending behaviour (for example, by providing you with spending insights)	- Keeping to contracts and agreements between you and us - Legitimate interests (we need to be efficient about how we meet our obligations and we want to provide you with good products and services) - Legal obligations
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- exercise other rights we have under any agreement we have with you - provide you with customer support services. We may record and monitor any communications between you and us, including phone calls, to maintain appropriate records, check your instructions, analyse, assess and improve our services, and for training and quality control purposes.	
Protecting against fraud We use your personal data to check your identity and to protect against fraud, keep to financial crime laws and to confirm that you are eligible to use our services. We also use it to help us better understand your company's financial circumstances and manage fraud risks related to your Paladis Business account.	- Legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities) - Legal obligations
Marketing and providing new products and services that might interest you We use your personal data to do the following: - provide you with information about other products and services we offer that are similar to those you have already used (or asked about, where allowed by law) - if you agree, provide you with information about our partners' promotions or offers which we think you might be interested in - if you agree, allow our partners and other organisations to provide you with information about their products or services - measure or understand the effectiveness of our marketing and advertising, and provide relevant advertising to you - ask your opinion about our products or services Remember, you can ask us to stop sending you marketing information (the How do you use my personal data for marketing? section below explains how to do this).	- Legitimate interests (to send business-to-business marketing, develop our products and services, ensure our marketing is relevant to your interests, and to be efficient about how we meet our legal and contractual duties) - Consent (where we are legally required to get your consent for business-to-business marketing)

To keep our services up and running We use your personal data to manage our website and the Paladis Business app, (including troubleshooting, data analysis, testing, research, statistical and survey purposes),	- Keeping to contracts and agreements between you and us - Legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply)
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and to make sure that content is presented in the most effective way for you and your device. We also use your personal data to: - verify your identity if you contact our customer support or social media teams - allow you to take part in interactive features of our services - tell you about changes to our services - help keep our website and the Paladis Business app safe and secure	to us and to present content as effectively as possible for you) - Consent (where required by law)
Preparing anonymous statistical datasets We prepare anonymous statistical datasets about our customers' spending patterns: - for forecasting purposes - to understand how customers use Paladis Business - to comply with governmental requirements and requests These datasets may be shared internally or externally with others, including non-Paladis companies. We produce these reports using information about you and other customers. The information used and shared in this way is never personal data and you will never be identifiable from it. Anonymous statistical data cannot be linked back to you as an individual. For example, some countries have laws that require us to report spending statistics and how money enters or leaves each country. We will provide anonymised statistical information that explains the broad categories of merchants that Paladis Business customers in that country spend their money with. We will also provide information about how Paladis Business customers top up their accounts and transfer money. However, we will not provide any customer-level information. It will not be possible to identify any individual Paladis Business customer.	- Legitimate interests (to conduct research and analysis, including to produce statistical research and reports) - Legal obligations
Improving our products and services We use your personal data to help us develop and improve our current products and services. This allows us to continue to provide products and services that our customers want to use.	- Legitimate interests (to understand how customers use our products so we can develop new products and improve the products we currently provide)

Meeting our legal obligations, enforcing our rights and other legal uses We use your personal data: - to share it with other organisations (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies) - if this is necessary to meet our legal or regulatory obligations (for example, some countries require us to understand which of our customers are vulnerable and require enhanced support) - in connection with legal claims - to help detect or prevent crime You can find out more in the Do you share my personal data with anyone else? section below. Sometimes, we are legally required to ask you to provide information about other people. For example, we might ask you to explain: - your relationship with somebody who pays money into your Paladis Business account - how somebody got the money in the first place to pay it into your Paladis Business account Where you, or your company, give us personal data about other people, it is your responsibility to ensure they understand how we will process their personal data.	- Legitimate interests (for example, to protect Paladis during a legal dispute) - Substantial public interest (if we process your sensitive personal data to keep to legal requirements that apply to us) - Legal obligations
Helping you to provide services to your customers We may provide payment processing services to you or your company. Where this happens, you, or your company, are responsible for deciding: - if we collect your customers' personal data - how we process your customers' personal data on your behalf You, or your company, are the 'controller' of your customers' personal data.	- Keeping to contracts and agreements between you and us - Legal obligations

